IV. Environmental Impact Analysis

G. Hazards and Hazardous Materials

1. Introduction

This section describes the existing hazards and hazardous materials setting of the Project Site and vicinity, identifies associated regulatory standards, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed Project. The analysis in this section evaluates whether the Project would create a significant hazard to the public or the environment due to hazardous conditions and/or hazardous materials. The information and analysis in this section is primarily based on:

Appendix F-1 Site 1: Stantec, Phase I Environmental Site Assessment (ESA) 1321, 1329, 1345 North Vermont, and 1328 North New Hampshire Avenue, Los Angeles, California 90027, March 11, 2016

Appendix F-1 Site 1: Stantec, Phase II ESA 1321, 1329, 1345 North Vermont, and 1328 North New Hampshire Avenue, Los Angeles, California 90027, April 19, 2016

Appendix F-1 Site 1: Stantec, Additional Subsurface Assessment Report 1321, 1329, 1345 North Vermont, and 1328 North New Hampshire Avenue, Los Angeles, California 90027, May 31, 2016

Appendix F-2 Site 1: Stantec, Asbestos, Lead-Based Paint, Polychlorinated Biphenyls in Caulk, and Other Hazardous Materials Survey: 1321, 1329, 1345 North Vermont and 1328 North New Hampshire Avenue, Los Angeles California 90027, March 11, 2016

Appendix F-2 Site 2: Forensic Analytical Consulting Services, Inc. (FACS), Pre-Construction Lead Survey Report, Kaiser Permanente Los Angeles Medical Center Medical Office Building 4760 Sunset Blvd., Los Angeles, CA 90027, April 10, 2016

Appendix F-2 Site 3: FACS, Pre-Demolition Lead Survey Report, Kaiser Permanente Los Angeles Medical Center Medical Office Building 1505 N. Edgemont Street Los Angeles, CA 90027, May 17, 2016

Appendix F-2 Site 4: FACS, Pre-Demolition Lead Survey Report, Kaiser Permanente Los Angeles Medical Center Medical Office Building 1526 N. Edgemont Street, Los Angeles, CA 90027, May 17, 2016

Appendix F-2 Site 5: FACS, Pre-Demolition Lead Survey Report, Kaiser Permanente Los Angeles Medical Center Medical Office Building 1517 N. Vermont Blvd., Los Angeles, CA 90027, May 17, 2016

Appendix F-2 Site 2: FACS, Limited Pre-Construction Asbestos Survey Report, Kaiser Permanente Los Angeles Medical Center Medical Office Building 4760 Sunset Blvd., Los Angeles, CA 90027, April 10, 2016

Appendix F-2 Site 3: FACS, Full-Building Non-Destructive: Asbestos Survey Report, Kaiser Permanente Los Angeles Medical Center Medical Office Building 1505 N. Edgemont Street, Los Angeles, CA 90027, May 17, 2016

Appendix F-2 Site 4: FACS, Full-Building Non-Destructive: Asbestos Survey Report, Kaiser Permanente Los Angeles Medical Center Medical Office Building 1526 N. Edgemont Street, Los Angeles, CA 90027, May 17, 2016

Appendix F-2 Site 5: FACS, Full-Building Non-Destructive: Asbestos Survey Report, Kaiser Permanente Los Angeles Medical Center Medical Office Building 1517 N. Vermont Avenue, Los Angeles, CA 90027, May 17, 2016

Appendix F-2 Site 3: FACS, PCB Survey Report: Findings in Initial Sampling Assessment, Kaiser Permanente Los Angeles Medical Center Medical Office Building 1505 N. Edgemont Street, Los Angeles, CA 90027, May 17, 2016

Appendix F-2 Site 4: FACS, PCB Survey Report: Findings in Initial Sampling Assessment, Kaiser Permanente Los Angeles Medical Center Medical Office Building 1526 N. Edgemont Street, Los Angeles, CA 90027, May 17, 2016

Appendix F-2 Site 5: FACS, PCB Survey Report: Findings in Initial Sampling Assessment, Kaiser Permanente Los Angeles Medical Center Medical Office Building 1517 N. Vermont Avenue, Los Angeles, CA 90027, May 17, 2016

Appendix F-3 Site 2: Stantec, Desktop Environmental Records Review 4760 Sunset Boulevard, Los Angeles, California, January 31, 2019

Appendix F-3 Site 3: Stantec, Desktop Environmental Records Review 1505 North Edgemont Street, Los Angeles, California, February 4, 2019

Appendix F-3 Stantec, Desktop Environmental Records Review 4867 Sunset Boulevard, Los Angeles, California, January 31, 2019

Appendix F-3 Site 4: Stantec, Desktop Environmental Records Review 1526 North Edgemont Street, Los Angeles, California, February 8, 2019

Appendix F-3 Site 5: Stantec, Desktop Environmental Records Review 1517 North Vermont Avenue, Los Angeles, California, February 8, 2019

Appendix F-3 Stantec, Desktop Environmental Records Review 4950 Sunset Boulevard, Los Angeles, California, February 4, 2019

2. Environmental Setting

a) Regulatory Framework

Several plans, regulations, and programs include policies, requirements, and guidelines regarding Hazards and Hazardous Materials at the federal, state, regional, and City of Los Angeles levels. As described below, these plans, guidelines, and laws include the following:

- Occupational Safety and Health Act of 1970
- Resource Conservation and Recovery Act
- Comprehensive Environmental Response, Compensation, and Liability Act
- Toxic Substances Control Act
- National Emission Standards for Hazardous Air Pollutants
- Department of Toxic Substances Control
- Government Code Section 65962.5 (Cortese List
- California Occupational Safety and Health Administration
- California Hazardous Waste Control Law
- California Accidental Release Prevention Program
- California Health and Safety Code
- California Underground Storage Tank Regulations

- Aboveground Petroleum Storage Act
- Government Code Section 3229 (California Geologic Energy Management Division)
- SCAQMD Rule 1403
- City of Los Angeles General Plan Safety Element
- City of Los Angeles Fire Department
- Los Angeles Municipal Code (Methane Zones and Methane Buffer Zones)

(1) Federal

(a) Occupational Safety and Health Act

The federal Occupational Safety and Health Act of 1970, which is implemented by the federal Occupational Safety and Health Administration (OSHA), contains provisions with respect to hazardous materials handling. Federal OSHA requirements, as set forth in Title 29 of the Code of Federal Regulations (CFR), are designed to promote worker safety, worker training, and a worker's right–to-know. The State is responsible for administrating OSHA regulations.[1]

The Occupational Safety and Health Act sets standards to comprehensively address the issue of evaluating and communicating chemical and physical standards to employees in the construction sector (the Construction Industry Hazards Communications Standard.[2] These requirements are also applicable to construction activities involving the demolition, salvage, removal, alteration, and maintenance, of any lead-containing materials, as well as lead contamination/emergency clean up, transportation. Disposal, storage, or containment of lead or materials containing lead on the site or location at which construction activities are performed (the Lead in Construction Standard[3]).

(b) Resources Conservation and Recovery Act

The Federal Resource Conservation and Recovery Act (RCRA), established in Title 40 of the CFR, gives the U.S. Environmental Protection Agency (EPA) the authority to control hazardous waste from the "cradle-to-grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste by "large-quantity generators" (1,000 kilograms/month or more). Under RCRA regulations, hazardous wastes must be tracked from the time of generation to the point of disposal. At a

1 Occupational Safety and Health Administration (OSHA), At-A-Glance-OSHA, 2014.
2 29 Code of Federal Regulations (CFR) 1926.59.
3 29 CFR 1926.62.

minimum, each generator of hazardous waste must register and obtain a hazardous waste activity identification number. If hazardous wastes are stored for more than 90 days or treated or disposed at a facility, any treatment, storage, or disposal unit must be permitted under RCRA. Additionally, all hazardous waste transporters are required to be permitted and must have an identification number. RCRA allows individual states to develop their own program for the regulation of hazardous waste, as long as the regulations are as stringent as the RCRA.[4]

(c) Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as "Superfund," was enacted by Congress on December 11, 1980. This law provided broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA established requirements concerning closed and abandoned hazardous waste sites, provided for liability of persons responsible for releases of hazardous waste at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified. CERCLA also enabled the revision of the National Contingency Plan. The National Contingency Plan provides the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The National Contingency Plan also established the National Priorities List, which is a list of contaminated sites warranting further investigation by the EPA. CERCLA was amended by the Superfund Amendments and Reauthorization Act on October 17, 1986.[5]

(d) Toxic Substances Control Act

The federal Toxic Substances Control Act of 1976 vested the EPA with authority to require reporting, record-keeping, and testing requirements, and established restrictions relating to chemical substances and/or mixtures. The act also establishes a process by which public exposure to asbestos-containing materials (ACM) is limited based on stricter requirements for the use, handling, and disposal of ACM. These regulations include the phase out of friable asbestos and ACM in new construction materials beginning in 1979. Thus, any building, structure, surface asphalt driveway, or parking lot constructed prior to 1979 could potentially contain ACM.[6]

4 U.S. Environmental Protection Agency (EPA), Summary of Resource Conservation and Recovery Act, 2018.
5 EPA, Summary of the Comprehensive Environmental Response, Compensation, and Liability Act (Superfund), 2018.
6 EPA, Summary of the Toxic Substances Control Act, 2018.

The disposal of hazardous waste building materials, including polychlorinated biphenyls (PCBs) is regulated under the Toxic Substances Control Act,[7] which contains life cycle provisions similar to those in the RCRA and the California Hazardous Waste Control Law as described above.

(e) National Emission Standards for Hazardous Air Pollutants

The EPA has also established National Emission Standards for Hazardous Air Pollutants (NESHAP) that govern the use, removal, and disposal of ACM as a hazardous air pollutant. The NESHAP regulations mandate the removal of friable ACM before a building is demolished and includes notification requirements prior to demolition. Responsibility for implementing these requirements has been delegated to the State of California, which in turn has delegated the responsibility to the South Coast Air Quality Management District (SCAQMD).

(2) State

(a) Department of Toxic Substances Control

At the State level, authority for the statewide administration and enforcement of RCRA is enforced through the California EPA's (CalEPA) Department of Toxic Substances Control (DTSC). While DTSC has primary state responsibility for regulating the generation, storage, and disposal of hazardous materials, it may further delegate enforcement authority to local jurisdictions. In addition, DTSC is responsible and/or provides oversight for contamination cleanup and administers statewide hazardous waste reduction programs. DTSC operates programs to accomplish the following: (1) deal with the aftermath of improper hazardous waste management by overseeing site cleanups; (2) prevent releases of hazardous waste by ensuring that those who generate, handle, transport, store, and dispose of wastes do so properly; and (3) evaluate soil, water, and air samples taken at sites. DTSC's hazardous waste regulations are located in the California Code of Regulations (CCR) at Title 22, Social Security, Division 4.5.

(b) Government Code Section 65962.5 (Cortese List)

Pursuant to Government Code Section 65962.5, environmental regulatory database lists were reviewed to identify and locate properties with known hazardous substance contamination within the proposed project area.[8,9] Four state agencies are required to provide lists of facilities that have contributed, harbor, or are responsible for environmental contamination within their jurisdiction. The four state agencies that are required to provide these lists to the Secretary for Environmental Protection include the DTSC, the State Department for Health Services, the State Water Resources Control

7 40 CFR 761.
8 California Government Code, Section 65960 et seq
9 California (Cal) EPA, "Cortese List: Section 6562.5(a)," accessed August 23, 2018.

Board, and the California Integrated Waste Management Board. The Secretary for Environmental Protection then takes each of the four respective agency lists and forms one list, referred to as the Hazardous Waste and Substances Site List – Site Cleanup (Cortese List), which is made available to every city and/or county in California.

(c) California Occupational Safety and Health Administration

California Occupational Safety and Health Administration (Cal/OSHA) is the primary agency responsible for worker safety in the handling and use of chemicals in the workplace. Cal/OSHA standards are generally more stringent than federal regulations. The employer is required to monitor worker exposure to listed hazardous substances and notify workers of exposure).[10] The regulations specify requirements for employee training, availability of safety equipment, accident prevention programs, and hazardous substance exposure warnings.

The demolition of buildings containing lead-based paints (LBPs) is subject to a comprehensive set of California regulatory requirements that are designed to ensure the safe handling and disposal of these materials. Cal/OSHA has established limits of exposure to lead contained in dusts and fumes, which provides for exposure limits, exposure monitoring, and respiratory protection, and mandates good working practices by workers exposed to lead, particularly since demolition workers are at greatest risk of adverse health exposure. Lead-contaminated debris and other wastes must also be managed and disposed of in accordance with applicable provisions of the California Health and Safety Code. The Cal/OSHA Lead in Construction Standard[11] applies to paints containing any amount of lead, even those with very low levels below 0.06%.

(d) California Hazardous Waste Control Law

The California Hazardous Waste Control Law[12] is administered by CalEPA to regulate the management of hazardous wastes. While the Hazardous Waste Control Law is generally more stringent than RCRA, until the EPA approves the California hazardous waste control program (which is charged with regulating the generation, treatment, storage, and disposal of hazardous waste), both the State and federal laws apply in California. The Hazardous Waste Control Law lists 791 chemicals and approximately 300 common materials that may be hazardous; establishes criteria for identifying, packaging, and labeling hazardous wastes; prescribes management controls; establishes permit requirements for treatment, storage, disposal, and transportation; and identifies some wastes that cannot be disposed of in landfills.

10 California Code of Regulations (CCR) Sections 337–340.
11 8 CCR 1532.1.
12 Health and Safety Code, Division 20, Chapter 6.5

(e) California Accidental Release Prevention Program

Similar to the Federal Risk Management Program, the California Accidental Release Prevention Program includes additional State requirements as well as an additional list of regulated substances and thresholds. The regulations of the program are contained in CCR Title 19, Division 2, Chapter 4.5. The intent of California Accidental Release Prevention Program is to prevent accidental releases of substances that can cause serious harm to the public and the environment, to minimize the damage if releases do occur, and to satisfy community right-to-know laws.

(f) California Health and Safety Code

The handling and storage of hazardous materials is regulated by Division 20, Chapter 6.95 of the California Health and Safety Code. Under Sections 25500–25543.3, facilities handling hazardous materials are required to prepare a hazardous materials business plan (HMBP). HMBPs contain basic information on the location, type, quantity, and health risks of hazardous materials stored, used, or disposed of in the State. Chapter 6.95 of the California Health and Safety Code establishes minimum statewide standards for HMBPs.

In addition, in the event that a facility stores quantities of specific acutely hazardous materials above the thresholds set forth by California Health and Safety Code, facilities are also required to prepare a risk management plan and a California Accidental Release Plan. The risk management plan and California Accidental Release Plan provide information on the potential impact zone of a worst-case release and require plans and programs designed to minimize the probability of a release and mitigate potential impacts.[13]

(g) California Underground Storage Tank Regulations

The State regulates underground storage tanks (USTs) pursuant to California Health and Safety Code, Division 20, Chapter 6.7, and CCR Title 23, Division 3, Chapter 16 and Chapter 18. The State's UST program regulations include, among others, permitting for USTs, installation of leak detection systems and/or monitoring of USTs for leakage, UST closure requirements, release reporting/corrective action, and enforcement. Oversight of the statewide UST program is assigned to the State Water Resources Control Board (SWRCB), which has delegated authority to the Regional Water Quality Control Boards (RWQCBs) and typically on the local level, to the fire department. The Los Angeles Fire Department (LAFD) administers and enforces federal and state laws and local ordinances for USTs at the Project Site. LAFD inspectors review plans for the construction/installation, modification, upgrade, and removal of USTs. If a release affecting groundwater is documented, the project file is transferred to the appropriate RWQCB for oversight.

[13] California Health and Safety Code, Chapter 6.95.

(h) Aboveground Petroleum Storage Act

In 1989, California established the Aboveground Petroleum Storage Act instituting a regulatory program covering aboveground storage tanks (ASTs) containing specified petroleum products.[14] The Aboveground Petroleum Storage Act applies to facilities with storage capacities of 10,000 gallons or more or are subject to oil pollution prevention and response requirements under 40 CFR Part 112. Under the Aboveground Petroleum Storage Act, each owner or operator of a regulated AST facility must file biennially a storage statement with the SWRCB disclosing the name and address of the AST facility; the contact person for the facility; and the location, size, age, and contents of each AST that exceeds 10,000 gallons in capacity and that holds materials that are at least 5 percent petroleum. In addition, each owner or operator of a regulated AST must prepare a Spill Prevention Control and Countermeasure Plan in accordance with federal and State requirements.[15] The responsibility for inspecting ASTs and ensuring that Spill Prevention Control and Countermeasure Plans have been prepared lies with the RWQCBs.

(i) Government Code Section 3229 (California Geologic Energy Management Division)

In compliance with Section 3229, Division 3 of the California Public Resources Code, before commencing any work to abandon any well, the owner or operator shall request approval from the California Geologic Energy Management Division, formerly the Division of Oil, Gas, and Geothermal Resources, via a written notice of intention to abandon the well.

(3) Regional

(a) SCAQMD Rule 1403

The SCAQMD regulates asbestos through Rule 1403, Asbestos Emissions from Renovation/Demolition Activities.[16] Rule 1403 defines asbestos as a toxic material and controls the emissions of asbestos from demolition and renovation activities by specifying agency notifications, appropriate removal procedures, and handling cleanup procedures. Rule 1403 applies to owners and operators involved in the demolition or renovation of asbestos-containing structures, asbestos storage facilities, and waste disposal sites.

[14] Health and Safety Code Sections 25270–25270.13.
[15] 40 CFR Part 112 and Health and Safety Code Section 25270.5[c].
[16] South Coast Air Quality Management District, Rule 1403 – Asbestos Emissions from Demolition/ Renovation Activities, as amended October 5, 2007.

(4) Local

(a) City of Los Angeles General Plan Safety Element

The Safety Element of the City of Los Angeles General Plan (Safety Element) is a State-mandated element that guides the City in addressing the protection of people from unreasonable risks associated with natural disasters—e.g., fires, floods, and earthquakes. The Safety Element includes goals, objectives, and policies defining City actions to implement comprehensive, integrated hazard mitigation plans and programs; emergency response and recovery plans and programs; and disaster recovery plans. The objectives and policies are broadly stated to reflect the comprehensive scope of the Emergency Operations Organization, the City agency that implements the Safety Element. The Safety Element does not include objectives or policies that pertain to the review of new development projects to avoid or mitigate impacts, but the policies guide the development of regulatory measures that may apply to development projects. The Safety Element also identifies responsibilities and protocols among City agencies in planning for and implementing services during an emergency event. Exhibit H, Critical Facilities and Lifeline Systems, of the Safety Element identifies disaster routes and selected emergency facilities that would provide needed infrastructure during an emergency response event.

(b) City of Los Angeles Fire Department

At the local level, the LAFD monitors the storage of hazardous materials for compliance with local requirements. Specifically, businesses and facilities that store more than threshold quantities of hazardous materials (as defined in Chapter 6.95 of the California Health and Safety Code) are required to file an Accidental Risk Prevention Program with the LAFD. This program must include information such as emergency contacts, phone numbers, facility information, chemical inventory, and hazardous materials handling and storage locations. The LAFD also issues permits for hazardous materials handling and enforces California's Hazardous Materials Release Response Plans and Inventory Law.[17] Basic requirements of California's Hazardous Materials Release Response Plans and Inventory Law include the development of detailed hazardous materials inventories used and stored on site, a program of employee training for hazardous materials release response, identification of emergency contacts and response procedures, and reporting of releases of hazardous materials. Any facility that meets the minimum reporting thresholds (i.e., a mixture containing a hazardous material that has a quantity at any one time during the reporting year that is equal to, or greater than, 55 gallons for materials that are liquids, 500 pounds for solids, or 200 cubic feet for compressed gas) must comply with the reporting requirements and file a Business Emergency Plan with the local administering agency.

[17] Health and Safety Code Section 25500 et seq.

The LAFD also administers the Fire Life Safety Plan Check and Fire Life Safety Inspections interpreting and enforcing applicable standards of the Fire Code (Title 19 of the Uniform Building Code), as well as City and Federal codes concerning new construction and remodeling. As part of the Fire Life Safety Plan Check and Fire Life Safety Inspections, businesses that store hazardous waste or hazardous materials in amounts exceeding the thresholds noted above are subject to review.

(c) Los Angeles Municipal Code (Methane Zones and Methane Buffer Zones)

Los Angeles Municipal Code, Chapter IX, Article 1, Division 71, Section 91.7103, also known as the Los Angeles Methane Seepage Regulations, establishes requirements for buildings and paved areas located in methane zones and methane buffer zones. Requirements for new construction within such zones include methane gas sampling and depending on the detected concentrations of methane and gas pressure at the site, application of design remedies for reducing potential methane impacts. The required methane mitigation systems are based on the Site Design Level, with more involved mitigation systems required at the higher Site Design Levels. The required methane mitigation systems are designed so that when properly implemented, they reduce methane-related risks to a less-than-significant level.

b) Existing Conditions

The Project would expand the existing Kaiser Permanente Los Angeles Medical Center (Medical Center) campus by replacing facilities and adding new buildings. The Medical Center properties proposed for redevelopment are listed below and are collectively referred to in this Draft Environmental Impact Report (EIR) as the “Project Site”:

- Site 1: 1345 North Vermont Avenue (Assessor’s Parcel Number [APN] 5543-013-009); 1329/1331 North Vermont Avenue and 1337/1339 North Vermont Avenue (APN 5543-014-015); 1317, 1321, and 1325 North Vermont Avenue (APN 5543-014-014); and 1326/1328 North New Hampshire Avenue (APN 5543-014-003)

- Site 2: 4760 Sunset Boulevard (APN 5543-015-021)

- Site 3: 1505 North Edgemont Street (APN 5543-007-25)

- Site 4: 1526 North Edgemont Street (APN 5543-010-017) and no address (APN 5543-020-014)

- Site 5: 1517 North Vermont Avenue (APN 5543-012-02)

- Site 6: 4950 West Sunset Boulevard (APN 5543-022-015)

The information discussed in the following sections under Existing Conditions is based on information provided through the Phase I ESA, Phase II ESA, and Additional Subsurface Assessment Report for Site 1 (Appendix F-1) prepared by Stantec; the Lead, Asbestos, and Polychlorinated Biphenyls reports (Appendix F-2) prepared by Stantec and FACS; and Desktop Environmental Records Review (Appendix F-3) prepared by Stantec.

(1) Current and Historical Uses of the Project Site

(a) Site 1

The property identified as Site 1 has not been developed by Kaiser Permanente and currently supports non-hospital uses that are not associated with Kaiser Permanente's operations. Site 1 is not currently located within the Unified Hospital Boundary as defined by the Vermont/Western Transit Oriented District Specific Plan/Station Neighborhood Area Plan (SNAP). However, part of the Project request involves amending the SNAP to include Site 1 in the Unified Hospital Boundary. Site 1 contains commercial structures and surface parking situated along North Vermont Avenue and a residential duplex structure with a detached garage situated along North New Hampshire Avenue. The current status and use of each of the addresses is as follows:

- 1345 North Vermont Avenue consists of one lot (Lot 61), is approximately 0.15 acres in size, and has one 3,847-square-foot commercial building; the commercial building formerly operated as a restaurant and is currently vacant.

- 1329/1331 and 1337/1339 North Vermont Avenue consists of two lots (Lots 59 and 60), is approximately 0.30 acres in size and is zoned commercial; no building structure exists at this address, and the entire area consists of an asphalt parking area.

- 1317, 1321, and 1325 North Vermont Avenue consists of three lots (Lots 56, 57, and 58), is approximately 0.45 acres in size and has two commercial buildings (7,349 square feet and 1,730 square feet); the commercial buildings are currently being used as various dental practices.

- 1326/1328 North New Hampshire Avenue consists of one lot (Lot 47), is approximately 0.15 acres in size, and has two building structures (one 1,787-square-foot residential dwelling and one 800-square-foot detached garage).

As Site 1 has not been previously developed by Kaiser Permanente, a Phase I ESA, Phase II ESA, and Additional Subsurface Assessment Report were prepared to evaluate the hazardous conditions associated with Site 1 (see Appendix F-1). The Phase I ESA indicated the historical operations associated with a gasoline/fueling station and adjacent dry-cleaning operations are considered recognized environmental conditions (RECs), and thus, a further subsurface investigation was required. The Phase II ESA identified contamination and risk exposure, and the Additional Subsurface Assessment Report was prepared to further investigate volatile organic compound (VOC) contamination previously identified at Site 1. The Additional Subsurface Assessment Report concluded the potential for vapor intrusion exists. The results of these assessments are described in the "Phase I and Phase II Environmental Site Assessments" section below.

(b) Site 2

Site 2 is within the Unified Hospital Development boundary pursuant to the SNAP and is currently developed with a 39-stall surface parking lot supporting Kaiser Permanente facilities and a three-level medical office building (MOB). The address associated with Site 2 is 4760 Sunset Boulevard. The existing MOB would be expanded through the construction of a Procedure Center, which would be developed over the existing surface parking lot. Since this MOB would undergo some reconstruction, there is the potential for building materials within the existing structure to contain hazardous materials. As such, a pre-construction lead survey[18] and pre-construction asbestos survey[19] (Appendix F-2) were conducted for the 4760 Sunset Boulevard MOB. The results of these assessments are described in the "Lead, Asbestos, and PCBs" section below.

Additionally, a desktop review environmental assessment was conducted for Site 2 to evaluate the possible presence of environmental conditions or impacts that may have sourced from current and historical site activities, and/or operations associated with surrounding properties and facilities (Appendix F-3). Until it was developed by Kaiser Permanente, Site 2 remained undeveloped until approximately 1948 when a transfer and storage business occupied several buildings and sheds on the property. In 1950 a small building labeled as "Auto Repairing" was located on the southeastern portion of the property. By 1960, a single commercial building identified as "Sunset Boulevard Hospital" was constructed on the property. By 1994, Site 2 was redeveloped with additional commercial/medical buildings. By 2005, Site 2 was developed into the current configuration of improvements.[20]

[18] Site 2: Forensic Analytical Consulting Services, Inc. (FACS), Pre-Construction Lead Survey Report, 4760 Sunset Blvd., April 10, 2016, provided in Appendix F-2 of this Draft EIR.

[19] Site 2: FACS, Limited Pre-Construction Asbestos Survey Report, 4760 Sunset Blvd., April 10, 2016, provided in Appendix F-2 of this Draft EIR.

[20] Site 2: Stantec, Desktop Environmental Records Review 4760 Sunset Boulevard, January 31, 2019, provided in Appendix F-3 of this Draft EIR.

Past land uses at nearby properties include gas stations and/or auto repair shops located at 4700, 4720, and 4747 Sunset Boulevard. Currently, the locations of these former gas stations and/or auto repair shops are fully developed commercial properties.[21]

As noted in the Desktop Environmental Records Review, Site 2 is on record as containing a permitted UST. However, the lead Kaiser Permanente engineer for the Medical Center determined that there is no UST located beneath Site 2. Further, the LAFD information request received on January 9, 2019, confirmed there were no USTs on site.[22] Although Site 2 is also identified as a past generator of hazardous waste, no records of environmental noncompliance or violations were found pertaining to the property during preparation of the Desktop Environmental Records Review search. Site 2 is located nearby multiple listings of hazardous waste generators and sites with current or historic releases of hydrocarbons to soil and/or groundwater. Nearly all the nearby leaking underground storage tank (LUST) sites have received regulatory case closure. There is one open LUST cleanup site at 1630 North Vermont, approximately 1,000 feet northeast of Site 2 The RWQCB approved a revised Remedial Action Plan in October 2018 to address fuel hydrocarbons in soil and groundwater at the site.

Numerous active USTs are present at facilities in the vicinity of Site 2. Eleven active USTs are located within the 1,750-foot search radius. The nearest off-site permitted USTs are located at the Church of Scientology at 1404 North Catalina Street, the Children's Hospital at 4661 Sunset Boulevard, and the Kaiser Permanente hospital located at 4867 Sunset Boulevard. These nearby UST sites are located just over 500 feet from Site 2. Properly maintained and permitted USTs are determined to be "low threats" to human health and the environment.[23,24]

(c) Site 3

Site 3, located at 1505 North Edgemont Street, is within the Unified Hospital Development boundary pursuant to the SNAP, and is occupied by a Kaiser Permanente MOB, small surface parking area, and parking structure. Since this MOB would undergo some reconstruction as a part of the proposed Project, there is the potential for building materials contained within the existing structure to contain hazardous materials. As such, a pre-demolition lead survey report, full-building non-destructive asbestos survey report, and PCB survey report were conducted for the 1505 North Edgemont Street MOB (Appendix F-2). The results of these assessments are described in the "Lead, Asbestos, and PCBs" section below.

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21 Site 2: Stantec, Desktop Environmental Records Review 4760 Sunset Boulevard, January 31, 2019, provided in Appendix F-3 of this Draft EIR.

22 Site 2: Stantec, Desktop Environmental Records Review 4760 Sunset Boulevard, January 31, 2019, provided in Appendix F-3 of this Draft EIR.

23 State Water Resources Control Board (SWRCB), "Underground Storage Tank (UST) Program Low-Threat Underground Storage Tank Case Closure Policy," accessed January 11, 2021.

24 Site 2: Stantec, Desktop Environmental Records Review 4760 Sunset Boulevard, January 31, 2019, provided in Appendix F-3 of this Draft EIR.

Additionally, a desktop review environmental assessment was conducted for Site 3 to evaluate the possible presence of environmental conditions or impacts that may have sourced from current and historical site activities, and/or operations associated with surrounding properties and facilities (Appendix F-3). Prior to the current development as a Kaiser Permanente MOB, the property located at 1505 Edgemont was developed with a small residential structure as early as 1919. By 1950, the eastern portion of the property was a gas station and automotive repair business. The remainder of the property remained occupied by cottages. By 1966, the property had been redeveloped with a building labeled as a 'clinic' with parking areas adjacent to the building. By 1970, the development layout of the property resembled the current MOB development.[25]

Historical maps and directory listings identified past land uses on nearby properties as gas stations and/or auto repair shops located at 4901, 5000, 5001, 5007, and 5025 Sunset Boulevard. Currently, two of these locations, 5007 and 5025 Sunset Boulevard, are active gas stations. The USA Gasoline station at 5025 Sunset is also a closed LUST case.[26]

Site 3 is not listed in database sources as containing a permitted UST and the lead Kaiser Permanente engineer for the Los Angeles Medical Center confirmed that there is no UST located beneath Site 3. Further, the records review from the City of Los Angeles Department of Building and Safety noted that in over 150 building department records and permits issued between 1962 and 2016, no activities related to hazardous materials or potential environmental conditions were noted in the permit applications. The LAFD indicated on January 14, 2019, there were no records pertaining to active and hazardous materials file information, active/inactive UST files, and any records that indicate environmental concern at Site 3. Although Site 3 was identified as a past generator of hazardous waste, no records of environmental noncompliance or violations were found pertaining to the property.

Site 3 is located nearby multiple listings of hazardous waste generators and sites with current or historic releases of hydrocarbons to soil and/or groundwater. Nearly all the nearby LUST sites have received regulatory case closure. There is one open LUST Cleanup Site at 1630 North Vermont, noted above. Numerous active USTs are present at facilities in the vicinity of Site 3. Eight active USTs are located within the search radius. The nearest off-site permitted USTs are at the Medical Center property located at 4867 Sunset Boulevard, approximately 300 feet northeast of Site 3. The next closest USTs are at two active gas stations located at 5007 and 5025 Sunset, approximately 650 feet west

[25] Site 3: Stantec, Desktop Environmental Records Review 1505 North Edgemont Street, February 4, 2019, provided in Appendix F-3 of this Draft EIR.

[26] Site 3: Stantec, Desktop Environmental Records Review 1505 North Edgemont Street, February 4, 2019, provided in Appendix F-3 of this Draft EIR.

of Site 3. Permitted USTs are determined to be "low threats" to human health and the environment.[27] Additionally, the one open LUST is undergoing remediation efforts.[28]

(d) Site 4

Site 4, located at 1526 North Edgemont Street, is within the Unified Hospital Development boundary pursuant to the SNAP, and is occupied by a Kaiser Permanente MOB. The proposed MOB at 1526 North Edgemont Street would connect via two pedestrian bridges to the adjacent hospital building at 4867 Sunset Boulevard. Since this MOB would undergo some reconstruction, there is the potential for building materials contained within the existing structure to contain hazardous materials. As such, a pre-demolition lead survey report, full-building non-destructive asbestos survey report, and PCB survey report were conducted for the 1526 North Edgemont Street MOB (Appendix F-2). The results of these assessments are described in the "Lead, Asbestos, and PCBs" section below.

Additionally, a desktop review environmental assessment was conducted for Site 4 to evaluate the possible presence of environmental conditions or impacts that may have sourced from current and historical site activities, and/or operations associated with surrounding properties and facilities (Appendix F-3). Prior to the current development as a Kaiser Permanente MOB, the properties at 1526 North Edgemont Street and 4867 Sunset Boulevard were developed with a portion of Barnsdall Art Park on Olive Hill, and remained undeveloped until approximately 1954 when the Kaiser Foundation Hospital developed on the southern portion. The original hospital consisted of a single, long, rectangular building. The location of the current 1526 North Edgemont Street building was a parking lot in 1954. By 1966, the Kaiser Foundation Hospital on the parcel had expanded to include an additional MOB and lab in the location of the current 1526 North Edgemont Street building. A parking garage building was also constructed to the north of Site 4. In subsequent years, Site 4 was developed as a part of the Medical Center, undergoing additional development in several phases. The most recent phase of redevelopment occurred in 2012–2013, resulting in the current configuration of improvements at the 4868 Sunset Boulevard property. [29,30]

[27] SWRCB, Underground Storage Tank (UST) Program Low-Threat Underground Storage Tank Case Closure Policy, 2021.

[28] Site 3: Stantec, Desktop Environmental Records Review 1505 North Edgemont Street, February 4, 2019, provided in Appendix F-3 of this Draft EIR.

[29] Site 4: Stantec, Desktop Environmental Records Review 1526 North Edgemont Street, February 8, 2019, provided in Appendix F-3 of this Draft EIR.

[30] Stantec, Desktop Environmental Records Review 4867 Sunset Boulevard, January 31, 2019, provided in Appendix F-3 of this Draft EIR.

Historical maps and directory listings identified gas stations and/or auto repair shops at 4850 Sunset Boulevard, to the south of Site 4, and at 4901 Sunset Boulevard (now 1505 North Edgemont Street), southwest across North Edgemont Street. Additional nearby former gas stations and/or auto repair shops were located at 4720, 4747, and 4874 Sunset Boulevard.[31,32]

Site 4 is not listed in database sources as containing a permitted UST and the lead Kaiser Permanente engineer for the Medical Center confirmed during the Environmental Records Review that there is no UST located beneath Site 4. Although Site 4 was identified as a past generator of hazardous waste, no records of environmental noncompliance or violations were found pertaining to the property. Site 4 is located nearby multiple listings of hazardous waste generators and sites with current or historic releases of hydrocarbons to soil and/or groundwater. Nearly all the nearby LUST sites have received regulatory case closure. Numerous active USTs are present at facilities in the vicinity of Site 4. Properly maintained and permitted USTs are determined to be "low threats" to human health and the environment.[33,34,35]

(e) Site 5

Site 5, located at 1517 North Vermont Avenue, is within the Unified Hospital Development boundary pursuant to the SNAP, is owned by Kaiser Permanente, and is occupied by a parking structure and a MOB. Since this MOB would undergo some reconstruction, there is the potential for building materials contained within the existing structure to contain hazardous materials. As such, a pre-demolition lead survey report, full-building non-destructive asbestos survey report, and PCB survey report were conducted for the 1517 North Vermont Avenue MOB (Appendix F-2). The results of these assessments are described in "Lead, Asbestos, and PCBs" section below.

Additionally, a desktop review environmental assessment was conducted for Site 5 to evaluate the possible presence of environmental conditions or impacts that may have sourced from current and historical site activities, and/or operations associated with surrounding properties and facilities (Appendix F-3). It should be noted that before the Request for Change of Address in August 1996, the address of 1517 North Vermont Avenue did not exist, and records pertaining to the property were listed under the

31 Site 4: Stantec, Desktop Environmental Records Review 1526 North Edgemont Street, February 8, 2019, provided in Appendix F-3 of this Draft EIR.

32 Stantec, Desktop Environmental Records Review 4867 Sunset Boulevard, January 31, 2019, provided in Appendix F-3 of this Draft EIR.

33 SWRCB, "Underground Storage Tank (UST) Program Low-Threat Underground Storage Tank Case Closure Policy," accessed January 11, 2021.

34 Site 4: Stantec, Desktop Environmental Records Review 1526 North Edgemont Street, February 8, 2019, provided in Appendix F-3 of this Draft EIR.

35 Stantec, Desktop Environmental Records Review 4867 Sunset Boulevard, January 31, 2019, provided in Appendix F-3 of this Draft EIR.

address of 1515 North Vermont Avenue. Prior to the current development as a Kaiser Permanente MOB, Site 5 was undeveloped and was a portion of Barnsdall Park on Olive Hill. Site 5 remained undeveloped until approximately 1957 when a gas station and auto repair shop were present and listed as Pedro Petroleum Corporation in 1962. By 1964, the California Federal Savings Association Office Building had been constructed at 1515 North Vermont Avenue with a parking lot (now 1517 Vermont Avenue), situated immediately north of the office building. By 1970, business occupants at the property were listed as Kaiser Foundation and later Kaiser Permanente. A parking structure was constructed on Site 5 by 1972.[36]

Historical maps and directory listings identified gas stations and/or auto repair shops at 1515 North Vermont Avenue (previous address), 1528 North Vermont Avenue, 1630 North Vermont Avenue, 4720 Sunset Boulevard, and 4700 Sunset Boulevard. Sparkling Cleaners was listed at 1553 North Vermont Avenue in 1980, and the active Hollywood Cleaners operates at 4730 Hollywood Boulevard. [37]

The previous address of 1515 North Vermont Avenue was listed in a database source as having contained a permitted UST, with a status listed as "inactive." However, the records review from the City of Los Angeles Department of Building and Safety noted that in 14 building department records and permits issued between 1965 and 1996, no activities related to hazardous materials or potential environmental conditions were noted in the permit applications. LAFD indicated on January 14, 2019 , there were no records pertaining to active and hazardous materials file information, active/inactive UST files, and any records that indicate environmental concern at Site 5. Additionally, the lead Kaiser Permanente engineer for the Medical Center confirmed that there is no UST located beneath Site 5. Although Site 5 was identified as a past generator of hazardous waste, no records of environmental noncompliance or violations were found pertaining to the property.

Site 5 is located nearby multiple listings of hazardous waste generators and sites with current or historic releases of hydrocarbons to soil and/or groundwater. Nearly all the nearby LUST sites have received regulatory case closure. There is one open LUST Cleanup Site at 1630 North Vermont, noted above, approximately 500 feet northeast of Site 5. Numerous active USTs are present at facilities in the vicinity of Site 5. Ten active USTs are located within the search radius. The nearest permitted UST is located 350 feet southwest of Site 5 at the Children's Hospital at 4650 Sunset Boulevard. Active USTs are located at the Kaiser Permanente building at 4760 Sunset Boulevard and the Kaiser Permanente hospital building at 4867 Sunset Boulevard, between 400 to 900 feet from Site 5. Properly maintained and permitted USTs are determined to be "low threats" to

[36] Site 5: Stantec, Desktop Environmental Records Review 1517 North Vermont Avenue, February 8, 2019, provided in Appendix F-3 of this Draft EIR.

[37] Site 5: Stantec, Desktop Environmental Records Review 1517 North Vermont Avenue, February 8, 2019, provided in Appendix F-3 of this Draft EIR.

human health and the environment.[38] Additionally, the one open LUST site is undergoing remediation efforts.[39]

(f) Site 6

Site 6, located at 4950 West Sunset Boulevard, is owned by Kaiser Permanente and is occupied by a surface parking and a single-level temporary construction trailer. Site 6 is not currently located within the Unified Hospital Boundary as defined by the SNAP. However, part of the Project request involves amending the SNAP to include Site 6 in the Unified Hospital Boundary. The Project would construct an addition to the 4950 Sunset Boulevard parking structure.

Additionally, a desktop review environmental assessment was conducted for Site 6 to evaluate the possible presence of environmental conditions or impacts that may have sourced from current and historical site activities, and/or operations associated with surrounding properties and facilities (Appendix F-3). Prior to the current development as a Kaiser Permanente MOB, the property was identified as the "Frances de Pauw Industrial School for Mexican Girls" in 1919, with the main building containing dormitories and kitchens, and several smaller adjoining or nearby buildings. By 1950, the property at 4950 Sunset Boulevard was referred to as the "Frances de Pauw Woman's Division, Christian Service of the M.E. Church." By 1972, a new building replaced the previous buildings, and further redevelopment by 1985 resulted in a building layout resembling the current development.[40]

Historical maps and directory listings identified past land uses on nearby properties as gas stations and/or auto repair shops located at 4901, 5000, 5001, 5007, and 5025 Sunset Boulevard. The former auto repair shop and gas station at 4901 Sunset Boulevard is the location of the current Kaiser Permanente MOB at 1505 North Edgemont Street.[41]

The property at 4950 Sunset Boulevard is listed in database sources as containing a permitted UST. However, LAFD records state that there are no USTs located beneath the property—only an aboveground diesel storage tank for the emergency generator exists. Furthermore, the lead Kaiser Permanente engineer for the Medical Center confirmed that there is no UST at the property. Although the property was identified as a past generator of hazardous waste, no records of environmental noncompliance or violations were found pertaining to the property. Site 6 is located nearby multiple listings of hazardous waste

[38] SWRCB, "Underground Storage Tank (UST) Program Low-Threat Underground Storage Tank Case Closure Policy," accessed January 11, 2021.

[39] Site 5: Stantec, Desktop Environmental Records Review 1517 North Vermont Avenue, February 8, 2019, provided in Appendix F-3 of this Draft EIR.

[40] Stantec, Desktop Environmental Records Review 4950 Sunset Boulevard, February 4, 2019, provided in Appendix F-3 of this Draft EIR.

[41] Stantec, Desktop Environmental Records Review 4950 Sunset Boulevard, February 4, 2019, provided in Appendix F-3 of this Draft EIR.

generators and sites with current or historic releases of hydrocarbons to soil and/or groundwater. Nearly all the nearby LUST sites have received regulatory case closure. Numerous active USTs are present at facilities in the vicinity of Site 6. Properly maintained and permitted USTs are determined to be "low threats" to human health and the environment.[42] Additionally, the one open LUST site is undergoing remediation efforts.[43]

(2) Phase I and Phase II ESAs

(a) Phase I ESA

A Phase I ESA report (Appendix F-1) was conducted for Site 1 to identify any RECs that exist on Site 1. Since the site is not associated with Kaiser Permanente's operations, and has not been recently developed, as compared to the other sites, a Phase I ESA was conducted for Site 1 only. The American Society for Testing and Materials Practice E1527-05 standard defines a REC as:

> … the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, ground water, or surface water of the property. The term includes hazardous substances or petroleum products even under conditions in compliance with laws. The term is not intended to include de minimis conditions that generally do not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be de minimis are not recognized environmental conditions.

A regulatory agency database was obtained from Environmental Data Resources Inc. (EDR) as part of the Phase I ESA. Site 1 was identified in the following environmental databases.

- CA HAZNET: Moncada's Dental Office, 1321 North Vermont Avenue (inorganic solid waste disposal)
  - No records were obtained for violations relating to the dental disposal practices. In addition, the disposal per the database review indicated that no waste disposal was on record.

[42] SWRCB, "Underground Storage Tank (UST) Program Low-Threat Underground Storage Tank Case Closure Policy," accessed January 11, 2021.

[43] Stantec, Desktop Environmental Records Review 4950 Sunset Boulevard, February 4, 2019, provided in Appendix F-3 of this Draft EIR.

- EDR Historical Auto Stations: The former address associated with Site 1 (1331 North Vermont Avenue) was listed in EDR's historical Auto Stations

  – No environmental records were obtained related to the former gasoline/fueling station during searches of the databases of the SWRCB (Geotracker), DTSC (EnviroStor), or LAFD records.

Table IV.G-1 summarizes the reviewed environmental database search results within a 1-mile radius of Site 1.

TABLE IV G. 1
ENVIRONMENTAL DATABASE SEARCH RESULTS

Site Name and Address	Database Listings	Relative Location	REC?
Children's Hospital of Los Angeles; 4650 Sunset Boulevard	RCRA-LQG, CA ENVIRONSTOR, CA HIST UST, CA FID UST, FINDS, CA EMI, NY MANIFEST, WI MANIFEST, LA Co. Site Mitigation, ECHO, CA UST. CA SWEEPS UST	0.086 miles/454 feet northwest equal/high elevation	No
This facility was reportedly a large quantity generator of hazardous wastes including non-listed ignitable and corrosive wastes, solvents, and other petroleum related wastes. No violations were reported. The facility reportedly maintained USTs (year unknown). Per CA FID UST database, the UST status was active. No further information was provided within the environmental database research. Due to lack of reported release or violation, this is not considered a REC.			
Fook Mar; 1309 North Vermont Avenue	EDR Historical Cleaners	0.008 miles/44 feet (adjacent) south lower elevation	Yes
The facility formerly operated as a dry cleaning facility from at least 1933 to at least 1942 (based on city directories). No further information was provided within the environmental database research. Based on the historical operations and adjacent location to the Property this listing is considered a REC for the Property.			
Proulx J H; 1307 North Vermont Avenue	EDR Historical Cleaners	0.011 miles/ 57 feet south lower elevation	Yes
The facility formerly operated as a dry cleaning facility from at least 1942 (based on city directories). No further information was provided within the environmental database research. Based on the historical operations and proximity to the Property this listing is considered a REC for the Property.			

NOTES: UST = underground storage tank; REC = recognized environmental condition

The remaining listings in the database identified in the Phase I ESA did not constitute a potential REC since they were not associated with reported releases or violations, and therefore, are not listed above.

In addition to the regulatory database search, historical aerial photographs, historical topographic maps, city directories, and historical fire insurance maps were reviewed. A site reconnaissance was also conducted and focused on observing current conditions that may indicate the presence of a REC, based on information provided in the records review. During the site reconnaissance, no evidence of improper storage of inorganic solid waste was observed at the dental office located at 1321 North Vermont Avenue, and the several historical dry-cleaning facilities were identified within 100 feet south of the Site 1.

Based on the information gathered from interviews, review of existing data, and the site reconnaissance, the following RECs were identified on Site 1:

- **Historical Gasoline/Fueling Station:** Historical operations at Site 1 included a gasoline/fueling station associated with 1329 and 1345 North Vermont Avenue (former address 1331 North Vermont Avenue). The gasoline station was identified in Sanborn maps, aerial photographs, and city directories, and appears to have operated at the site from at least 1929 to approximately 1960. No environmental records were obtained through environmental database research. However, prior reports indicated environmental investigations were conducted at the site in 1993 by Smith-Emery Company and in 1994 by AMI ADINI & Associates Inc. The environmental investigations were completed to evaluate the former gasoline/fueling station and associated former UST basin. Based on these reports, four USTs were previously located at the facility (three 1,000-gallon USTs and one 10,000-gallon gasoline UST). The USTs were used until approximately 1959–1960. As part of these investigations, a limited magnetometer survey was conducted; the survey did not identify any metallic anomaly indicative of a UST. Petroleum hydrocarbon-contaminated soils with gasoline (TPHg) and benzene, toluene, ethylbenzene, and xylenes (BTEX) were observed in each of the investigations, with the predominate area located closer to the right-of-way of North Vermont Avenue. The investigations also indicate that the contamination appears to have migrated vertically to the confining layer approximately 22 feet below ground surface. Groundwater was not encountered during any of the subsurface investigations. Based on the historical gasoline/fueling operations at Site 1, including residual impacts from gasoline, this finding is considered a REC.

- **Adjacent Historical Dry Cleaning Operations:** Several historical dry cleaning operations were identified to have operated adjacent and/or less than 100 feet south of Site 1. Dry cleaners generate relatively large volumes of hazardous substances, and the chemicals used by dry cleaners could have spilled and discharged to the sewers or migrated off site, resulting in groundwater contamination. Based on the nature of these historical operations and the proximity to the Site, the former dry cleaning operations are considered a REC.

Other potential issues identified as part of the Phase I ESA included:

- **Dental office:** A portion of Site 1, Moncada's Dental Office located at 1321 North Vermont Avenue, was listed on the CA HAZNET database for inorganic solid waste disposal. No records were obtained for violations relating to the dental disposal practices. In addition, as per the database review, no waste disposal was on record. During site reconnaissance activities, no evidence was observed for improper storage of inorganic solid waste; and therefore, this business's operations are not considered a REC.

- **Asbestos, Lead-Based Paint, Polychlorinated Biphenyls in Caulk, Hazardous Materials, and Lead Shielding:** Based on the age of the buildings located at 1321, 1329, 1345 North Vermont Avenue and 1328 North New Hampshire Avenue (built from at least 1925 to 1960), a pre-renovation Asbestos, LBP, PCBs in Caulk, and Hazardous Materials Survey was completed.[44] Further discussion in regards to these surveys and their findings are discussed in the "Lead, Asbestos, and PCBs" section below.

(b) Phase II ESA

Based on these findings, a Phase II subsurface investigation was recommended to evaluate the current subsurface conditions associated with the 1329 and 1345 North Vermont Avenue property's historical gasoline/fueling station operations, and the former dry cleaning operations of the adjacent properties. A geophysical survey was conducted to identify the presence of USTs. No USTs were identified during this investigation; however, this was a limited assessment and based on the historical use of the Project Site, any future redevelopment of the Project should include the possibility of encountering/assessing USTs, piping, dispensers, and/or any other UST system component (Appendix F-1). Additionally, as part of the Phase II ESA (Appendix F-1), 10 soil borings were collected for the soil assessment and four soil vapor probes were installed for the soil vapor assessment.[45] The soil assessment and soil vapor assessment conducted as part of the Phase II ESA determined this portion of Site 1 to be a Significant Environmental Risk per the EPA method detailed in Appendix F-1. Contamination by, and risk of exposure to, petroleum hydrocarbons related to the former gasoline/fueling operations and adjacent dry cleaning operations was identified at the site. The Phase II

[44] Site 1: Stantec, Asbestos, Lead-Based Paint, Polychlorinated Biphenyls in Caulk, and Other Hazardous Materials Survey: 1321, 1329, 1345 North Vermont and 1328 North New Hampshire Avenue, March 11, 2016, provided in Appendix F-2 of this Draft EIR.

[45] Site 1: Stantec, Phase II Environmental Site Assessment 1321, 1329, 1345 North Vermont, and 1328 North New Hampshire Avenue, April 19, 2016, provided in Appendix F-1 of this Draft EIR.

ESA recommended further assessment to determine the extent of impacts, as well as remediation options and costs.

(c) Additional Subsurface Assessment Report

Based on the recommendations of the Phase II ESA for further evaluation, preparation of an additional Subsurface Assessment Report (Appendix F-1) was recommended to further evaluate VOCs identified in the soil and soil vapor at Site 1 during the April 2016 Phase II ESA. To further investigate the VOC contamination previously identified at Site 1, eight soil borings were advanced; 13 soil vapor monitoring wells were installed (five dual nested and three shallow); and soil and soil vapor samples were collected and submitted to a fixed based laboratory for chemical analysis.

Based on the additional assessment, gasoline range organics, benzene, ethylbenzene, and 1,2,4-trimethylbenzene were identified in the soil at concentrations exceeding EPA Regional Screening Levels. These constituents appear to be from gasoline and are likely associated with the former gasoline/fueling station. Based on the location of the historical gasoline operations and the detection of petroleum hydrocarbon impacts at the Site 1 boundary along Vermont Avenue, contaminants may have migrated from Site 1 into the right-of-way of Vermont Avenue. However, the extent and levels of the off-site migration is unknown. Based on the VOC impacts observed in soil and soil vapor during the additional subsurface assessment, it was determined that the potential for vapor intrusion exists. For the reasons previously discussed, the contaminated soils are likely a result of the former gasoline/fueling station, although dry cleaning operations may also have impacted the soils.

(3) Lead, Asbestos, and PCBs

Sites 1, 2, 3, 4, and 5 contain buildings that would be demolished or reconstructed for the Project. Information on the potential hazards associated with each of these building sites is outlined below. Site 6 has a single-level temporary construction trailer; however, because this temporary modular building will be relocated rather than demolished, no lead, asbestos, or PCB surveys were conducted for Site 6. Temporary modular buildings like the construction trailer on Site 6 are not, and will not be, demolished in the same way permanent structures, such as those on Sites 1 through 5, will be.

(a) Lead

(i) Site 1

It was determined during the LBPs survey performed by Stantec (Appendix F-2) that some of the paints met the definition of an LBP. Additionally, some paints were determined to be lead-containing.[46]

(ii) Site 2

Only very low levels of lead were expected due to the post-1978 construction of the MOB at Site 2, but testing was performed primarily because it is still possible for newer ceramic tiles or ceramic fixtures to contain high levels of lead. The Protect LPA-1 XRF Analyzer utilized for the testing is a direct-reading instrument that determines the concentration of lead in paints. The XRF instrument measures lead in units of milligrams of lead per square centimeter of tested surface (mg/cm2). No paints or ceramics with high levels of lead were identified. However, readings of 0.0 mg/cm^2 or negative readings (e.g., -0.4 mg/cm^2) do not necessarily indicate there is no lead present, as the XRF instrument does not have sufficient sensitivity to determine a zero result. As such, during construction all affected paints and ceramic tiles should be assumed to contain some small amount of lead.[47] Survey results of the XRF testing are provided in Appendix F-2 to this Draft EIR.

(iii) Site 3

The pre-demolition lead inspection at Site 3 included the testing of ceramic tiles, restroom fixtures, and paints at the existing MOB for the presence of lead. However, readings of 0.0 milligrams per cubic centimeter (mg/cm^2) or negative readings (e.g., -0.4 mg/cm^2) do not necessarily indicate there is no lead present, as the XRF instrument does not have sufficient sensitivity to determine a zero result. As such, during construction, all affected paints and ceramic tiles should be assumed to contain some small amount of lead. The following were identified as lead shielding, lead used as a form of radiation protection, or LBP/ceramic:[48]

- Basement: Rooms 0071, 0072, 0073, 0075, 0076, and 0078 – lead X-ray shielding at walls, glass, etc.
- 1st Floor: Restrooms 1066 and 1067 – sinks

[46] Site 1: Stantec, Asbestos, Lead-Based Paint, Polychlorinated Biphenyls in Caulk, and Other Hazardous Materials Survey, March 11, 2016, provided in Appendix F-2 of this Draft EIR.

[47] Site 2: FACS, Pre-Construction Lead Survey Report, 4760 Sunset Blvd., April 10, 2016, provided in Appendix F-2 of this Draft EIR.

[48] Site 3: FACS, Pre-Demolition Lead Survey Report, 1505 N. Edgemont Street, May 17, 2016, provided in Appendix F-2 of this Draft EIR.

- 1st Floor: Restroom at SW stairs – sink
- 5th Floor: Restroom 5155 – old style urinal

Survey results of the XRF testing are provided in Appendix F-2 to this Draft EIR.

(iv) Site 4

The pre-demolition lead inspection at Site 4 included testing of ceramic tiles, restroom fixtures, and paints at the existing MOB for the presence of lead. The following were identified as lead shielding or LBP/ceramic:[49]

- Basement: Rooms B013, B017, and B021 – lead X-ray shielding at walls, glass, etc.
- 3rd Floor, 4th Floor, and 7th Floor: Elevator Lobby and hallway – ceramic floor and baseboard tile
- 1st Floor: NE Women's Restroom – 2-inch green accent ceramic wall tile
- 1st Floor: N Utility Room – Sink
- 3rd Floor: Room G3122A – Sink (square shape)
- 4th Floor: Rooms G4021, G4052, G4055, and Restrooms G4002, G4007, and G4043 – Sinks (square shape)
- 5th Floor: Rooms G503, G512, and G539 – 2-inch red accent ceramic wall tile
- 6th Floor: Rooms G6010, G6016, G6036, and G6086 – 2-inch red accent ceramic wall tile
- Exterior – White and gray paint on stucco

Survey results of the XRF testing are provided in Appendix F-2 to this Draft EIR.

[49] Site 4: FACS, Pre-Demolition Lead Survey Report, 1526 N. Edgemont Street, May 17, 2016, provided in Appendix F-2 of this Draft EIR.

(v) Site 5

The pre-demolition lead inspection at Site 5 included testing of ceramic tiles, restroom fixtures, and paints at the existing MOB for the presence of lead. However, readings of 0.0 mg/cm^2 or negative readings (e.g., -0.4 mg/cm^2) do not necessarily indicate there is no lead present, as the XRF instrument does not have sufficient sensitivity to determine a zero result. As such, during construction, all affected paints and ceramic tiles should be assumed to contain some small amount of lead. The following materials were identified as LBP:[50]

- Turquoise wall paint
- White, yellow, and red floor stripe and curb marking paints
- Stairwells grey metal door frame paint

Survey results of the XRF testing are provided in Appendix F-2 to this Draft EIR.

(b) Asbestos

Since Sites 1, 2, 3, 4, and 5 contain buildings that would be demolished or reconstructed for the Project, the discussion below summarizes the surveys conducted and information gathered on the potential hazards associated with each of these proposed building sites. Site 6 has a single-level temporary construction trailer; however, as this temporary modular building would be relocated rather than demolished, no lead, asbestos, or PCB surveys were conducted for Site 6.

(i) Site 1

An asbestos survey was performed at the buildings located on Site 1 (Appendix F-2). The asbestos survey revealed the following:[51]

- A variety of ACMs were identified at Site 1 (1326 North New Hampshire, 1345 North Vermont, and 1321 North Vermont). The ACMs consisted of vinyl floor tiles, sealants, asphalt roofing, pipe wrap, paper tape, and window putty.
- Stucco identified on exterior walls associated 1321 North Vermont Avenue is considered asbestos-containing construction material (>0.1% - <1% asbestos).

[50] Site 5: FACS, Pre-Demolition Lead Survey Report, 1517 N. Vermont Blvd., May 17, 2016, provided in Appendix F-2 of this Draft EIR.

[51] Site 1: Stantec, Asbestos, Lead-Based Paint, Polychlorinated Biphenyls in Caulk, and Other Hazardous Materials Survey, March 11, 2016, provided in Appendix F-2 of this Draft EIR.

(ii) Site 2

An asbestos survey was performed at the existing MOB located on Site 2. The asbestos inspection included testing of building materials that might contain asbestos and that might be impacted by future construction. Few, if any, ACMs were expected given the recent construction of this MOB, but testing was performed in order to satisfy regulatory requirements and because it is still possible for certain types of newer building materials to contain asbestos. No ACMs were identified in areas affected by the planned construction (Appendix F-2).[52]

(iii) Site 3

A full-building and non-destructive asbestos survey was conducted at the existing MOB located on Site 3, including sampling of accessible suspect asbestos-containing building materials that could be sampled non-destructively (Appendix F-2). The MOB, though scheduled ultimately for demolition, remained occupied and operating during the asbestos survey. The survey was performed between November 4, 2015, and April 7, 2016 (Appendix F-2).

The following materials were identified as ACMs:[53]

- Joint compound associated with drywall
- Various vinyl floor tile mastics
- Various vinyl sheet flooring mastics
- Black flooring mastic remnants
- Sink undercoating
- Plaster walls and ceilings
- Plaster overspray
- Baseboard mastic
- Carpet mastic

[52] Site 2: FACS, Limited Pre-Construction Asbestos Survey Report, 4760 Sunset Blvd., April 10, 2016, provided in Appendix F-2 of this Draft EIR.

[53] Site 3: FACS, Full-Building Non-Destructive: Asbestos Survey Report, 1505 N. Edgemont Street, May 17, 2016, provided in Appendix F-2 of this Draft EIR.

(iv) Site 4

A full-building and non-destructive asbestos survey was conducted at the existing MOB located on Site 4, including sampling of accessible suspect asbestos-containing building materials that could be sampled non-destructively. This MOB, though scheduled ultimately for demolition, remained occupied and operating during the asbestos survey. The survey was performed between December 7, 2015, and April 7, 2016 (Appendix F-2).

The following materials were identified as ACMs:[54]

- Plaster walls and ceilings
- Plaster overspray
- Joint compound associated with drywall
- Spray applied fireproofing
- Various vinyl floor tile mastics
- Various vinyl sheet flooring mastics
- Black flooring mastic remnants
- Carpet mastics
- Waterproofing paper membrane with tar
- HVAC duct sealant (roof mechanical room)
- Exterior asbestos-cement panels

(v) Site 5

A full-building and non-destructive asbestos survey was conducted at the existing MOB located on Site 5, including sampling of accessible, suspect asbestos-containing building materials that could be sampled non-destructively. This MOB, though scheduled ultimately for demolition, remained occupied and operating during the asbestos survey. The survey was performed between November 2, 2015, and January 28, 2016 (Appendix F-2).

[54] Site 4: FACS, "Full-Building Non-Destructive: Asbestos Survey Report, 1526 N. Edgemont Street, May 17, 2016, provided in Appendix F-2 of this Draft EIR.

The following materials were identified as ACMs:[55]

- Exterior caulk material
- Vinyl sheet flooring mastic
- Baseboard mastic
- Wall paint/skim coat

(c) Polychlorinated Biphenyls

Since Sites 1, 3, 4, and 5 contain buildings that would be demolished or reconstructed for the Project, the discussion below includes information on the potential hazards associated with each of these proposed building sites. Site 2 was not surveyed because PCB studies are not required for post-1980 construction. Site 6 has a single-level temporary construction trailer; however, the temporary modular building will be relocated rather than demolished, and thus, no PCB surveys were required or conducted for Site 6.

(i) Site 1

A PCB survey of the buildings located on Site 1 was performed (Appendix F-2). The PCB survey revealed that all caulk samples taken from all buildings were non-PCB-containing.[56]

(ii) Sites 3, 4, and 5

The PCB survey report for Sites 3, 4, and 5 (Appendix F-2) involved identification and sampling of suspect caulk on the exterior of each existing MOB, identification and characterization of porous and non-porous substrates in contact with tested caulk, and designation of waste categories for caulk and substrates, as necessary. Some of the tested material (caulk) identified at Sites 3 and 4 were found to contain PCBs greater than the disposal threshold of 50 milligrams per kilogram (mg/kg).[57,58] None of the caulk sampled at Site 5 identified PCBs greater than the important disposal threshold of 50 mg/kg.[59] No porous substrates were identified adjacent to PCB-containing caulk at any of these three

55 Site 5: FACS, Full-Building Non-Destructive: Asbestos Survey Report, 1517 N. Vermont Avenue, May 17, 2016, provided in Appendix F-2 of this Draft EIR.
56 Site 1: Stantec, Asbestos, Lead-Based Paint, Polychlorinated Biphenyls in Caulk, and Other Hazardous Materials Survey, March 11, 2016, provided in Appendix F-2 of this Draft EIR.
57 Site 3: FACS, PCB Survey Report: Findings in Initial Sampling Assessment, 1505 N. Edgemont Street, May 17, 2016, provided in Appendix F-2 of this Draft EIR.
58 Site 4: FACS, PCB Survey Report: Findings in Initial Sampling Assessment, 1526 N. Edgemont Street, May 17, 2016, provided in Appendix F-2 of this Draft EIR.
59 Site 5: FACS, PCB Survey Report: Findings in Initial Sampling Assessment, 1517 N. Vermont Avenue, May 17, 2016, provided in Appendix F-2 of this Draft EIR.

building sites. Non-porous substrates can be cleaned to below EPA limits for unrestricted disposal or recycling, or they can be disposed of with the adjacent caulk for all three sites.

(4) Proximity to School

As shown on **Figure IV.G-1**, Schools Within One-Quarter Mile, the Project Site is located within 0.25 miles of several existing schools, including Los Feliz Elementary School, at 1740 North New Hampshire Avenue; Mary's Schoolhouse, at 1334 L Ron Hubbard Way; Rose and Alex Pilibos Armenian School, at 1615 Alexandria Avenue; and the Pacific Southwest Lutheran Learning Center, at 1518 North Alexandria Avenue.[60]

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the State California Environmental Quality Act (CEQA) Guidelines the Project would have a significant impact related to hazards and hazardous materials if it would:

Threshold (a): ***Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; or***

Threshold (b): ***Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; or***

Threshold (c): ***Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school; or***

Threshold (d): ***Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment; or***

Threshold (e): ***Be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area; or***

[60] California Department of Education, Earth Layer – California Schools, https://services.gis.ca.gov/arcgis/rest/services/Society/California_Schools/MapServer, accessed July 7, 2017.

Threshold (f): Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or

Threshold (g): Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

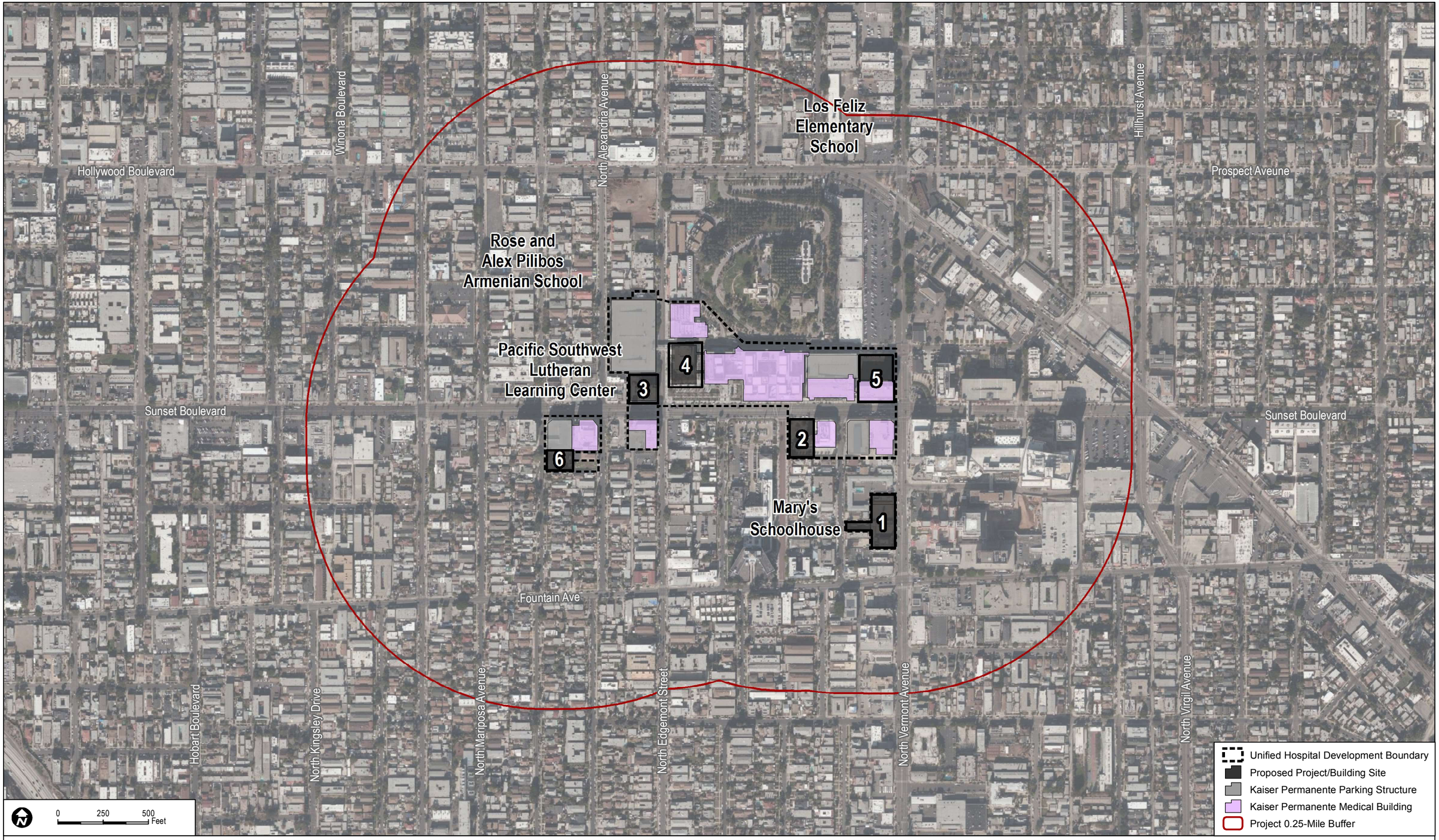
This analysis relies on the CEQA Appendix G Thresholds. The analysis also uses the following factors and considerations identified in the 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions.

(1) Risk of Upset/Emergency Preparedness

- The regulatory framework;
- The probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance;
- The degree to which the project may require a new, or interfere with an existing, emergency response or evacuation plan, and the severity of the consequences; and
- The degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance.

(2) Human Health Hazards

- The regulatory framework for the health hazard;
- The probable frequency and severity of consequences to people from exposure to the health hazard; and
- The degree to which project design would reduce the frequency of exposure or severity of consequences of exposure to the health hazard.



SOURCE: Perkins and Will, 2017; Bing Maps 2017

FIGURE IV.G-1

Schools Within One-Quarter Mile

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b) Methodology

Impact determinations in this section are based on the potential risks of exposure to hazards and hazardous materials during construction and operation of the Project. The analysis contained within this section is based on the results of the Phase I ESA, Phase II ESA, Additional Subsurface Assessment Report (Appendix F-1); and lead surveys, asbestos surveys, and PCBs surveys (Appendix F-2) conducted for the Project Site. The Phase I ESA includes (1) a reconnaissance of the Project Site; (2) a search of regulatory agency records; and (3) review of available historical aerial photographs, topographic maps, historical fire insurance maps, and City directories. The Phase II ESA includes geophysical surveys and soil sampling. The Additional Subsurface Assessment includes the results of the installation of soil vapor monitoring wells. The lead, asbestos, and PCB surveys identify LCM, ACM, and PCBs (if any) in the interior, exterior, and roofs of the existing structures proposed for demolition or reconstruction.

c) Project Design Features

As discussed in Section IV.M, Transportation, of this Draft EIR, the Project includes preparation of a Construction Staging and Traffic Management Plan (CSTMP) (Project Design Feature **TR-PDF-1**), which would ensure provisions for maintaining emergency access to the Project Site during construction.

d) Analysis of Project Impacts

Threshold (a): Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

(1) Impact Analysis

(a) Construction

(i) Lead, Asbestos, and PCBs

Construction activities associated with the Project would involve demolition and reconstruction of existing buildings on Sites 1, 2, 3, 4, and 5. As discussed above, LBP, asbestos and/or PCB surveys were conducted for the existing buildings on the Project Site that are proposed for demolition and/or reconstruction. Site 6 has a single-level temporary construction trailer; however, as this temporary modular building will be relocated rather than demolished, no LBP, asbestos or PCB surveys were conducted or required for Site 6.

The presence of LBP was determined by assessing the conditions of painted surfaces, collecting paint chip samples, and testing ceramic tiles and/or fixtures. No paints or ceramics with high levels of lead were identified on Site 2. However, readings of 0.0 mg/cm^2 or negative readings (e.g., -0.4 mg/cm^2) do not necessarily indicate there is no lead present, as the XRF instrument does not have sufficient sensitivity to determine a zero result (Appendix F-2). As such, it is assumed to contain small amounts of lead. Sites 1, 3, 4, and 5 were identified as containing LBPs (Appendix F-2). Demolition or reconstruction plans impacting Sites 1, 3, 4, and 5would result in the exposure of workers and/or the public to LBP. To reduce potential impacts during demolition, all affected paints and ceramic tile should be assumed to contain some amount of LBP, and construction activities should and would be carried out in compliance with the Cal/OSHA Lead in Construction Standard.[61] Cal/OSHA has established limits of exposure to lead contained in dusts and fumes, which provides for exposure limits, exposure monitoring, and respiratory protection, and mandates good working practices by workers exposed to lead. Lead-contaminated debris and other wastes should also, and would be, managed and disposed of in accordance with applicable provisions of the California Health and Safety Code.

The asbestos survey involved visual inspection of building materials for the presence of ACMs. No ACMs were identified on Site 2 in areas affected by the planned construction (Appendix F-2). Various materials identified on Sites 1, 3, 4, and 5 were identified as ACMs (Appendix F-2). Some materials were assumed to contain asbestos due to their destructive nature of sampling and should be treated as asbestos-containing and not disturbed. To reduce the potential of accidental release of ACMs, renovation and/or demolition of structures located on Sites 1, 3, 4, and 5 would be permitted and conducted in compliance with NESHAP and local requirements of the SCAQMD, including Rule 1403. Additionally, the ACMs would be removed by certified personnel properly trained in accordance with OSHA asbestos construction standards. Removal of the ACMs would be completed by an appropriately licensed contractor in accordance with all applicable federal, State, and local regulations.

The PCB survey revealed that all caulk samples were non-PCB-containing at Site 1 (Appendix F-2). PCB studies are not required for post-1980 construction; thus, Site 2 was not surveyed. None of the caulk sampled at Site 5 identified PCBs greater than the important disposal threshold of 50 mg/kg at (Appendix F-2). The PCB surveys conducted for Sites 3 and 4 identified PCBs that exceeded the important disposal threshold of 50 mg/kg (Appendix F-2).

[61] 8 CCR 1532.1.

Based on the above analysis, the Project's exceedance of PCB levels at Sites 3 and 4 could create a significant hazard. However, Mitigation Measure MM-HAZ-1, provided below, would be implemented to reduce this potentially significant impact to a less-than-significant level.

(ii) Handling of Hazardous Materials

A variety of hazardous substances and wastes would be stored, used, and generated on the Project Site during construction activities. These would include fuels for machinery and vehicles, new and used motor oils, cleaning solvents, paints, and storage containers and applicators containing such materials. Accidental spills, leaks, fires, explosions, or pressure releases involving hazardous materials represent a potential threat to human health and the environment if not properly stored, used, managed or treated, which would result in a significant impact.

Impacts related to the routine transport, use, disposal, or accidental release of hazardous materials during demolition and construction of the Project would be significant. However, implementation of Mitigation Measure MM-HAZ-2, provided below, would reduce this potentially significant impact to a less-than-significant level.

(b) Operation

The Project involves the construction of MOBs, parking structures, and associated infrastructure improvements. It is assumed that routine landscaping and building maintenance, as well as hospital uses, would involve the transport, use, or disposal of hazardous materials on or off site. As such, impacts related to the routine transport, use, disposal, or accidental release of hazardous materials during the Project operation would be potentially significant. However, pursuant to the State of California Medical Waste Management Act of 1990, Kaiser Permanente is required to prepare a medical waste management plan (MWMP) for submittal to the California Department of Public Health. The MWMP would describe the types and amounts of medical waste generated and how the waste would be disposed. Additionally, in accordance with California Health and Safety Code, Article 1, Chapter 6.95 for the business emergency plan, Kaiser Permanente must also prepare an HMBP for submittal to the California Environmental Reporting System. Implementation of the MWMP and HMBP would reduce potentially significant impacts related to operational hazards and hazardous materials.

Further, Kaiser Permanente is required to comply with all applicable environmental federal, State, and local laws, including the California Hazardous Waste Control Law[62] and the Hazardous Waste Control Regulations.[63] Additionally, the transport, use, and

[62] California Health and Safety Code Division 20, Chapter 6.5.
[63] 22 CCR 4.5.

disposal of hazardous materials would not differ dramatically in type and quantity from existing operations, none of which are currently considered environmental concerns. Finally, Kaiser Permanente would prepare an MWMP and an HMBP prior to receiving a certificate of occupancy for each newly constructed building, to ensure the safe routine transport, use, and/or disposal of hazardous materials. **Impacts related to the routine transport, use, disposal, or accidental release of hazardous materials during operation of the Project would not be significant, and no mitigation is required.**

(2) Mitigation Measures

In order to reduce potential impacts related to the transport, use, or disposal of hazardous materials during construction, Mitigation Measures **MM-HAZ-1** and **MM-HAZ-2** would be required.

> **MM-HAZ-1: Polychlorinated Biphenyl (PCB) Waste Characterization, Segregation, Disposal and Reuse Plan.** Prior to building demolition, PCB-containing materials must be characterized, segregated, and disposed of in accordance with federal law. The Applicant will engage a licensed contractor to complete the on-site cleanup and disposal of PCBs in accordance with 40 Code of Federal Regulations (CFR) 761.61(a). This requires preparation of a PCB Waste Characterization, Segregation, Disposal, and Reuse Plan (Plan), notifications to the U.S. Environmental Protection Agency (EPA), characterization of PCB-containing materials, remediation or removal of said materials, and proper disposal of said materials. The PCB Waste Characterization, Segregation, Disposal, and Reuse Plan shall include air monitoring (in accordance with South Coast Air Quality Management District Rule 1403) and soil testing and may also include pilot studies to verify that the proposed remediation strategies are effective. These components would be developed by the licensed contractor, in cooperation with the Applicant. Notifications will be completed as required in 40 CFR 761.61(a)(3); the EPA Regional Administrator has 30 days to review and comment on the Plan; if EPA does not comment, it is deemed approved.

MM-HAZ-2: **Hazardous Substance Management, Handling, Storage, Disposal, and Emergency Response Plan.** In order to reduce the risk of accidental release of hazardous materials during construction activities at the site, which release is not foreseeable or anticipated, the Applicant shall prepare and implement during all construction activities a hazardous substance management, handling, storage, disposal, and emergency response plan. A hazardous materials spill kit shall be maintained on site for small spills. Additionally, the Applicant shall monitor all contractors for compliance with applicable regulations, including regulations regarding hazardous materials and hazardous wastes, including disposal. Hazardous materials shall not be disposed of or released on the ground, in the underlying groundwater, or any surface water. Totally enclosed containment will be provided for all trash. All construction waste, including trash and litter, garbage, other solid waste, petroleum products, and other potentially hazardous materials, will be removed to a waste facility permitted to treat, store, or dispose of such materials.

(3) Level of Significance after Mitigation

To reduce risks related to PCBs, preparation of a PCB Waste Characterization, Segregation, Disposal, and Reuse Plan for submission to EPA Region 9 is required and would be prepared and submitted. The plan will serve as notification and certification as required for the self-implementing cleanup and disposal as defined in 40 CFR 761.61(a). Prior to the plan being developed, meetings with Kaiser Permanente and select contractors will be necessary to determine the scope or work, removal plans, pilot studies, etc. Upon EPA's review, removal and disposal of the regulated PCB materials, by a qualified remediation contractor, the Project can proceed prior to building demolition. The PCB Waste Characterization, Segregation, Disposal, and Reuse Plan will include air and soil testing and may also include pilot studies for verification that the proposed remediation strategies are effective (see Mitigation Measure **MM-HAZ-1**).

To reduce risks associated with the transport, use, or disposal of hazardous materials during construction activities, Kaiser Permanente would prepare and implement, during all construction activities, a hazardous substance management, handling, storage, disposal, and emergency response plan (see Mitigation Measure **MM-HAZ-2**). A hazardous materials spill kit would be maintained on site for small spills. Additionally, Kaiser Permanente would monitor all contractors for compliance with applicable regulations, including regulations regarding hazardous materials and hazardous wastes, including disposal. Hazardous materials shall not be disposed of or released on the ground, in the underlying groundwater, or any surface water. Totally enclosed containment shall be provided for all trash. All construction waste, including trash and litter, garbage, other solid waste, petroleum products, and other potentially hazardous

materials, would be removed to a waste facility permitted to treat, store, or dispose of such materials (see Mitigation Measure **MM-HAZ-2**).

With the implementation of Mitigation Measures **MM-HAZ-1** and **MM-HAZ-2**, hazardous substance management, handling, storage, disposal, and emergency response plan would be prepared and implemented, and potentially significant impacts would be reduced to a less-than-significant level.

Threshold (b): Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

(1) Impacts Analysis

(a) Construction

(i) Lead, Asbestos, and PCBs

Construction activities associated with the Project would involve demolition and reconstruction of existing buildings on Building Sites 1, 2, 3, 4, and 5. As discussed above, LBP, asbestos, and PCB surveys were conducted for existing buildings on the Project Site that are proposed for demolition and/or reconstruction. Site 6 has a single-level temporary construction trailer; however, as this temporary modular building will be relocated rather than demolished, no LBP, asbestos, or PCB surveys were conducted or required for Site 6.

The presence of LBP was determined by assessing the conditions of painted surfaces, collecting paint chip samples, and testing ceramic tiles and/or fixtures. No paints or ceramics with high levels of lead were identified on Site 2. However, readings of 0.0 mg/cm^2 or negative readings (e.g., -0.4 mg/cm^2) do not necessarily indicate there is no lead present, as the XRF instrument does not have sufficient sensitivity to determine a zero result (Appendix F-2). As such, it is assumed to contain small amounts of lead. Sites 1, 3, 4, and 5 were identified as containing LBPs (Appendix F-2). Demolition or reconstruction plans impacting these five building sites (Sites 1–5) would therefore result in the exposure of workers and/or the public to LBP. To reduce potential impacts during demolition, all affected paints and ceramic tile should be assumed to contain some amount of LBP, and construction activities should and would be carried out in compliance with the Cal/OSHA Lead in Construction Standard.[64] Cal/OSHA has established limits of exposure to lead contained in dusts and fumes, which provides for exposure limits, exposure monitoring, and respiratory protection, and mandates good working practices by workers exposed to lead. Lead-contaminated debris and other wastes should and

[64] 8 CCR 1532.1.

would also be managed and disposed of in accordance with applicable provisions of the California Health and Safety Code.

The asbestos surveys conducted at Sites 1–5 involved visual inspection of building materials for the presence of ACMs. No ACMs were identified on Site 2 in areas affected by the planned construction (Appendix F-2). Various materials identified on Sites 1, 3, 4, and 5 were identified as ACMs (Appendix F-2). Some materials were assumed to contain asbestos due to the inability to sample them non-destructively and should be treated as asbestos-containing and not be disturbed. To reduce the potential of accidental release of ACMs, renovation and/or demolition of structures located on Sites 1, 3, 4, and 5 would be permitted and conducted in compliance with NESHAP and local requirements of the SCAQMD, including Rule 1403. Additionally, the ACMs would be removed by certified personnel properly trained in accordance with OSHA asbestos construction standards. Removal of the ACMs would be completed by an appropriately licensed contractor in accordance with all applicable federal, state, and local regulations.

PCB studies were not required for Sites 2 and 6 because (1) for Site 2, PCB studies are not applicable to post-1980 construction; and (2) no structures on Site 6 would be demolished.

Thus, PCB surveys were conducted for Sites 1, 3, 4, and 5 only. The PCB surveys revealed that all caulk samples were non-PCB-containing at Site 1 (Appendix F-2). The PCB surveys conducted for Sites 3 and 4 identified PCBs that exceeded the important disposal threshold of 50 mg/kg on (Appendix F-2). None of the caulk sampled at Site 5 identified PCBs greater than the important disposal threshold of 50 mg/kg (Appendix F-2). **Since the PCBs exceeded the important disposal threshold at Sites 3 and 4, impacts are potentially significant. However, implementation of Mitigation Measure MM-HAZ-1, described below, would reduce this potentially significant impact to a less than significant level.**

(ii) Vapor Intrusion Risk

Since Site 1 is not currently used for Kaiser Permanente operations, and has not been recently developed, as compared to the other building sites, a Phase I ESA was conducted for Site 1 only. Sites 2, 3, 4, 5, and 6 are currently within the Unified Hospital Boundary pursuant to the SNAP and/or have been recently developed by Kaiser Permanente; therefore, subsurface construction activities conducted in connection with the Project would not pose a foreseeable vapor intrusion risk and a Phase I ESA was not required or conducted for these building sites.

According to the Phase I ESA and Phase II ESA, VOCs were identified on Site 1, which appeared to be associated with the former historical gasoline/fueling operations (Appendix F-1). The Additional Subsurface Assessment Report, which was recommended to further evaluate VOCs, identified the presence of benzene,

ethylbenzene, and xylenes in soil vapor above regulatory screening levels (Appendix F-1). **Due to the VOCs observed in soil and soil vapor during the additional subsurface assessment, it was determined that the potential for vapor intrusion exists. Therefore, the Project could result in the accidental release of contaminated soils during construction, if discovered. Mitigation Measures MM-HAZ-3 and MM-HAZ-4 are required and would reduce this potentially significant impact to a less-than-significant level.**

(iii) Underground Storage Tanks

No USTs were identified on Site 1 (Appendix F-3); however, because this was a limited assessment based on the historical use of the Project Site, any future redevelopment of the Project should include the possibility of encountering/assessing USTs, piping, dispensers, and/or any other UST system component.[65] Therefore, exposure of workers or the public to contaminated soils during construction activities would be a significant impact.

Site 2 is on record as containing a permitted UST. However, the LAFD information request received on January 9, 2019, noted there were no USTs on site. Further, the lead Kaiser Permanente engineer for the Medical Center confirmed that there is no UST located beneath Site 2 (Appendix F-3).[66] Site 3 is not listed in database sources as containing a permitted UST, and the records review from the City of Los Angeles Department of Building and Safety noted that in over 150 building department records and permits issued between 1962 and 2016, no activities related to hazardous materials or potential environmental conditions were noted in the permit applications (Appendix F-3).[67] Further, the lead Kaiser Permanente engineer for the Medical Center confirmed that there is no UST located beneath Site 3. Site 4 is not listed in database sources as containing a permitted UST and the lead Kaiser Permanente engineer for the Medical Center confirmed that there is no UST located beneath Site 4 (Appendix F-3).[68] The previous address of 1515 North Vermont Avenue was listed in a database source as having contained a permitted UST, with a status listed as "inactive." The records review from the City of Los Angeles Department of Building and Safety noted that in 14 building department records and permits issued between 1965 and 1996, no activities related to hazardous materials or potential environmental conditions were noted in the permit applications. The LAFD indicated on January 14, 2019, there were no records pertaining

[65] Site 1: Stantec, Phase II ESA 1321, 1329, 1345 North Vermont, and 1328 North New Hampshire Avenue, April 19, 2016, provided in Appendix F-1 of this Draft EIR.

[66] Site 2: Stantec, Desktop Environmental Records Review 4760 Sunset Boulevard Los Angeles, California, January 31, 2019, provided in Appendix F-3 of this Draft EIR.

[67] Site 3: Stantec, Desktop Environmental Records Review 1505 North Edgemont Street Los Angeles, California, February 4, 2019, provided in Appendix F-3 of this Draft EIR.

[68] Site 4: Stantec, Desktop Environmental Records Review 1526 North Edgemont Street Los Angeles, California, February 8, 2019, provided in Appendix F-3 of this Draft EIR.

to active and hazardous materials file information, active/inactive UST files, and any records that indicate environmental concern at Site 5 (Appendix F-3).[69] Further, the lead Kaiser Permanente engineer for the Los Angeles Medical Center confirmed that there is no UST located beneath Site 5. The property at 4950 Sunset Boulevard is listed in database sources as containing a permitted UST. However, LAFD records state that there are no USTs located beneath the property; only an aboveground diesel storage tank for the emergency generator exists. Furthermore, the lead Kaiser Permanente engineer for the Los Angeles Medical Center confirmed that there is no UST at Site 6 (Appendix F-3). As such, Sites 3 and 4 are not listed as containing USTs are the lead Kaiser Permanente engineer confirmed such. Although USTs are listed at Sites 2, 5, and 6 the LAFD and City of Los Angeles Department of Building and Safety have no records of hazardous materials on site. Additionally, Kaiser Permanente engineer has confirmed no USTs are located beneath the sites. Therefore, the Project would not cause significant upset at Sites 2, 3, 4, 5, and 6 due to release from a UST.

Nearly all the nearby LUST sites have received regulatory case closure. There is one open LUST cleanup site at 1630 North Vermont, approximately 500 feet northeast of Site 5. The RWQCB approved a revised Remedial Action Plan in October 2018 to address fuel hydrocarbons in soil and groundwater at the site. Thus, the Building Sites would not be impacted by the LUST cleanup site.

Due to the possibility of encountering/assessing USTs, piping, dispensers, and/or any other UST system component at Site 1, the Project would have potentially significant impacts. Therefore, the Project could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. However, Mitigation Measure MM-HAZ-3 is required and would reduce this potentially significant impact to a less-than-significant level.

(iv) Handling of Hazardous Materials

As previously discussed under Threshold (a), a variety of hazardous substances and wastes would be stored, used, and generated on the Project Site during construction activities. These would include fuels for machinery and vehicles, new and used motor oils, cleaning solvents, and paints, as well as storage containers and applicators containing such materials. Accidental spills, leaks, fires, explosions, or pressure releases involving hazardous materials represent a potential threat to human health and the environment if not properly stored, used, managed or treated, which could result in a significant impact.

[69] Site 5: Stantec, Desktop Environmental Records Review 1517 North Vermont Avenue Los Angeles, California, February 8, 2019, provided in Appendix F-3 of this Draft EIR.

Impacts related to creating a significant hazard would be significant. However, Mitigation Measure MM-HAZ-2 is required and would reduce this potentially significant impact to a less-than-significant level.

(b) Operation

The Project involves the construction of MOBs, parking structures, and associated infrastructure improvements. It is assumed that routine landscaping and building maintenance, as well as hospital uses, would involve the transport, use, or disposal of hazardous materials on or off site. Pursuant to the State of California Medical Waste Management Act of 1990, Kaiser Permanente is required to prepare an MWMP for submittal to the California Department of Public Health. The MWMP will describe the types and amounts of medical waste generated and how the waste will be disposed. Additionally, in accordance with California Health and Safety Code, Article 1, Chapter 6.95 for the business emergency plan, Kaiser Permanente must also prepare an HMBP for submittal to the California Environmental Reporting System. Implementation of the MWMP and HMBP requirements would reduce potentially significant impacts related to operational hazards and hazardous materials.

Further, Kaiser Permanente is required to comply with all applicable environmental federal, state, and local laws, including the California Hazardous Waste Control Law[70] and the Hazardous Waste Control Regulations.[71] Additionally, the transport, use, and disposal of hazardous materials would not differ dramatically in type and quantity from existing operations, none of which are currently considered environmental concerns. Since Kaiser Permanente would prepare an MWMP and an HMBP prior to receiving a certificate of occupancy for each newly constructed building, the safe routine transport, use, and/or disposal of hazardous materials would be ensured.

Therefore, the Project's operational impacts would not create a significant hazard. No Mitigation Measures are required.

(2) Mitigation Measures

In order to reduce the potential for the Project to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment during construction, Mitigation Measures **MM-HAZ-1, MM-HAZ-2, MM-HAZ-3**, and **MM-HAZ-4**, would be required.

[70] California Health and Safety Code Division 20, Chapter 6.5.
[71] 22 CCR 4.5.

Please refer to Threshold (a) for a description of Mitigation Measures **MM-HAZ-1** and **MM-HAZ-2**.

> **MM-HAZ-3**: **Soil Management Plan.** The Applicant shall prepare a soil management plan (SMP) for Site 1 prior to excavation and redevelopment activities. The purpose of the SMP is to provide guidance to project management, site management, and field personnel on the identification and management of impacted and clean soil, the segregation and management of impacted soil in accordance with regulatory requirements, the transportation of impacted soil to an off-site disposal facility licensed to accept such soil, and the identification and management of construction debris during excavation, grading, and construction activities to be completed at Site 1. The SMP shall include procedures for identification, handling, reporting, and removal of possible USTs, piping, dispensers or other UST components that may be encountered during construction. The SMP shall include health and safety measures, which may include but are not limited to personal protective equipment and periodic work breathing zone monitoring and monitoring for volatile organic compounds using a handheld organic vapor analyzer in the event impacted soils are encountered during excavation activities.
>
> **MM-HAZ-4**: **Vapor Barrier.** Soil vapor sampling will be conducted to determine the nature and extent of soil vapor contamination. The analytical results shall be compared to applicable regulatory screening levels. Should soil vapor concentrations exceed applicable screening levels, a vapor mitigation system will be designed for new facilities that include occupied space within the area of contamination. The vapor mitigation system may include passive or active techniques to remove the risk of vapor intrusion into occupied structures. Such conditions could include soil impacted with volatile organic compounds (VOCs) being left in place beneath the depth of ground disturbance for new construction, the presence of shallow groundwater containing VOC beneath the property, or soil vapor migration from adjacent or nearby sites impacted with VOC. The incorporation of a vapor mitigation system must be reflected in the new building plans.

(3) Level of Significance after Mitigation

With implementation of **MM-HAZ-1**, preparation of a PCB Waste Characterization, Segregation, Disposal, and Reuse Plan for submission to EPA Region 9 is required and would be prepared and submitted. The plan would serve as notification and certification as required for the self-implementing cleanup and disposal as defined in 40 CFR 761.61(a). Prior to the plan being developed, meetings with Kaiser Permanente and select contractors will be necessary to determine the scope or work, removal plans, pilot

studies, etc. Upon EPA's review, removal and disposal of the regulated PCB materials, using a qualified remediation contractor, can proceed prior to building demolition. The PCB Waste Characterization, Segregation, Disposal, and Reuse Plan would include air and soil testing and may also include pilot studies for verification that the proposed remediation strategies are effective and would reduce impacts related to PCBs to less than significant.

Per the recommendations included in the Additional Subsurface Assessment Report,[72] Kaiser Permanente must provide the results of the subsurface investigation to the Los Angeles RWQCB to determine what additional actions, if any, may be required. Although Site 1 is not listed as an open regulatory case, it should be noted that Site 1 could become an open case following communication with the Los Angeles RWQCB. It is anticipated that redevelopment on Site 1 would require mitigation by soil removal and/or installation of a vapor barrier/mitigation systems beneath the proposed buildings. All mitigation will be required to be, and will be, completed and any new building construction will be occupied in accordance with federal, state, and local regulations. In addition, Kaiser Permanente will be required to and will prepare an SMP for Site 1 prior to excavation and redevelopment activities. The purpose of the SMP is to provide guidance to project management, site management, and field personnel on the identification and management of soil that is impacted and clean, to segregate and stockpile impacted soil, and remove and dispose of it at a disposal facility licensed to accept such soil in accordance with all applicable regulations. This SMP would include information associated with the possibility of encountering/assessment USTs, piping, dispensers, and/or any other UST system component (see Mitigation Measure **MM-HAZ-3**). In addition, Kaiser Permanente would implement Mitigation Measure **MM-HAZ-4**, which requires the incorporation of a vapor barrier into the new building plans if potential vapor encroachment conditions are indicated or suspected during construction. Incorporation of a vapor barrier would protect future occupants from impacted soils, and impacts would be less than significant.

Due to the possibility of encountering/assessing USTs, piping, dispensers, and/or any other UST system component at Site 1, Mitigation Measure **MM-HAZ-3** requires preparation of an SMP prior to excavation and redevelopment activities at Site 1. The SMP would include information associated with the possibility of encountering/ assessment USTs, piping, dispensers, and/or any other UST system component. With implementation of Mitigation Measure **MM-HAZ-3**, impacts related to USTs would be less than significant.

[72] Site 1: Additional Subsurface Assessment Report 1321, 1329, 1345 North Vermont, and 1328 North New Hampshire Avenue, May 31, 2016, provided in Appendix F-1 of this Draft EIR.

To reduce the risk of an accidental release of hazardous materials during construction activities at the Project Site, Kaiser Permanente would prepare and implement a hazardous substance management, handling, storage, disposal, and emergency response plan during all construction activities (Mitigation Measure **MM-HAZ-2**). A hazardous materials spill kit would be maintained on site for small spills that do not pose a serious risk if promptly and properly responded to. Additionally, Kaiser Permanente would monitor all contractors for compliance with applicable regulations, including regulations regarding hazardous materials and hazardous wastes, including disposal. Any hazardous materials shall be properly disposed. All construction waste, including trash and litter, garbage, other solid waste, petroleum products, and other potentially hazardous materials, would be removed to a waste facility permitted to treat, store, or dispose of such materials (see Mitigation Measure **MM-HAZ-2**).

Based on the analysis above, the Project would not create a significant hazard during construction activities with implementation of Mitigation Measures MM-HAZ-1, MM-HAZ-2, MM-HAZ-3, and MM-HAZ-4.

Threshold (c): Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

The Project Site is located within 0.25 miles of several existing schools, including Los Feliz Elementary School, at 1740 North New Hampshire Avenue; Mary's Schoolhouse, at 1334 L Ron Hubbard Way; Rose and Alex Pilibos Armenian School, at 1615 Alexandria Avenue; and the Pacific Southwest Lutheran Learning Center, at 1518 North Alexandria Avenue (Nearby Schools).[73]

(1) Impact Analysis

(a) Construction

(i) Lead, Asbestos, and PCBs

As previously discussed, the buildings on the Project Sites proposed for demolition contain lead, asbestos, and PCBs and thus could impact the nearby schools. However, compliance with applicable regulations would reduce the potential for Project demolition to result in a significant threat to the environment. To reduce potential impacts during demolition, all affected paints and ceramic tile should be assumed to contain some amount of LBP, and construction activities would be carried out in compliance with the Cal/OSHA Lead in Construction Standard.[74] Cal/OSHA has established limits of exposure

[73] Google Earth. Project Site imagery, https://www.google.com/earth/, 2020.
[74] 8 CCR 1532.1.

to lead contained in dusts and fumes, which provides for exposure limits, exposure monitoring, and respiratory protection, and mandates good working practices by workers exposed to lead. Lead-contaminated debris and other wastes must also and will be managed and disposed of in accordance with applicable provisions of the California Health and Safety Code. To reduce the potential of accidental release of ACMs, renovation and/or demolition of structures located on Sites 1, 3, 4, and 5 would be permitted and conducted in compliance with NESHAP and local requirements of the SCAQMD, including Rule 1403. Additionally, the ACMs would be removed by certified personnel properly trained in accordance with OSHA asbestos construction standards. Removal of the ACMs would be completed by an appropriately licensed contractor in accordance with all applicable federal, state, and local regulations.

PCB surveys were conducted for Sites 1, 3, 4, and 5 only. The PCB survey for Site 1 revealed that all caulk samples were non-PCB-containing (Appendix F-2). The PCB surveys conducted for Sites 3 and 4 identified PCBs that exceeded the important disposal threshold of 50 mg/kg (Appendix F-2). None of the caulk sampled at Site 5 identified PCBs greater than the important disposal threshold of 50 mg/kg (Appendix F-2). **Since PCBs exceeded threshold at Sites 3 and 4, the Project's potential impacts are considered significant. However, Mitigation Measure MM-HAZ-1 is required and would reduce this potentially significant impact to a less-than-significant level.**

(ii) Vapor Intrusion Risk

Since Site 1 is not associated with Kaiser Permanente's operations, and has not been recently developed, as compared to the other building sites, a Phase I ESA was conducted for Site 1 only. As Sites 2, 3, 4, 5, and 6 are within the Unified Hospital Boundary under the SNAP and have been recently developed or used by Kaiser Permanente, subsurface construction activities would not pose a foreseeable vapor intrusion risk and Phase I analyses were not required or conducted. Further, such investigations (e.g., Phase I) were conducted at the time of development of these sites.

According to the Phase I ESA and Phase II ESA conducted for Site 1, VOCs were identified, which appeared to be associated with the former historical gasoline/fueling operations at this property (Appendix F-1).

The Additional Subsurface Assessment Report, which was recommended to further evaluate VOCs on Site 1, identified the presence of benzene, ethylbenzene, and xylenes in soil vapor above regulatory screening levels (Appendix F-1). Due to the VOC impacts observed in soil and soil vapor during the additional subsurface assessment, it was determined that the potential for vapor intrusion exists. Therefore, the Project could result in the accidental release of contaminated soils during construction, if discovered.

Due to the VOCs observed in the soil and soil vapor during the additional subsurface assessment, it was determined that the potential for vapor intrusion exists at Site 1. Therefore, the Project could emit hazardous materials within 0.25 miles of an existing or proposed school during construction. Mitigation Measures MM-HAZ-3 and MM-HAZ-4 are required and would reduce this potentially significant impact to a less-than-significant level.

(iii) Underground Storage Tanks

No USTs were identified during on Site 1 (Appendix F-3); however, this was a limited assessment and based on the historical use of the Project Site, any future redevelopment of the Project should include the possibility of encountering/assessing USTs, piping, dispensers, and/or any other UST system component.[75] Therefore, exposure of workers or the public to contaminated soils during construction activities would be a significant impact.

Site 2 is on record as containing a permitted UST. However, the LAFD information request received on January 9, 2019, noted there were no USTs on site (Appendix F-3).[76] Further, the lead Kaiser Permanente engineer for the Medical Center confirmed that there is no UST located beneath Site 2. Site 3 is not listed in database sources as containing a permitted UST, and the records review from the City of Los Angeles Department of Building and Safety noted that in over 150 building department records and permits issued between 1962 and 2016, no activities related to hazardous materials or potential environmental conditions were noted in the permit applications (Appendix F-3).[77] Further, the lead Kaiser Permanente engineer for the Medical Center confirmed that there is no UST located beneath Site 3. Site 4 is not listed in database sources as containing a permitted UST and the lead Kaiser Permanente engineer for the Medical Center confirmed that there is no UST located beneath Site 4 (Appendix F-3).[78] The previous address of 1515 North Vermont Avenue was listed in a database source as having contained a permitted UST, with a status listed as “inactive.” The records review from the City of Los Angeles Department of Building and Safety noted that in 14 building department records and permits issued between 1965 and 1996, no activities related to hazardous materials or potential environmental conditions were noted in the permit applications. The LAFD indicated on January 14, 2019, there were no records pertaining to active and hazardous materials file information, active/inactive UST files, and any

[75] Site 1: Stantec, Phase II ESA 1321, 1329, 1345 North Vermont, and 1328 North New Hampshire Avenue, April 19, 2016, provided in Appendix F-1 of this Draft EIR.

[76] Site 2: Stantec, Desktop Environmental Records Review 4760 Sunset Boulevard Los Angeles, California, January 31, 2019, provided in Appendix F-3 of this Draft EIR.

[77] Site 3: Stantec, Desktop Environmental Records Review 1505 North Edgemont Street Los Angeles, California, February 4, 2019, provided in Appendix F-3 of this Draft EIR.

[78] Site 4: Stantec, Desktop Environmental Records Review 1526 North Edgemont Street Los Angeles, California, February 8, 2019, provided in Appendix F-3 of this Draft EIR.

records that indicate environmental concern at Site 5 (Appendix F-3).[79] Further, the lead Kaiser Permanente engineer for the Medical Center confirmed that there is no UST located beneath Site 5. The property at 4950 Sunset Boulevard is listed in database sources as containing a permitted UST. However, LAFD records state that there are no USTs located beneath the property; only an aboveground diesel storage tank for the emergency generator exists. Furthermore, the lead Kaiser Permanente engineer for the Medical Center confirmed that there is no UST at Site 6 (Appendix F-3). As such, Sites 3 and 4 are not listed as containing USTs, and and the lead Kaiser Permanente engineer confirmed such. Although USTs are listed at Sites 2, 5, and 6, the LAFD and City of Los Angeles Department of Building and Safety have no records of hazardous materials on site. Additionally, Kaiser Permanente engineer has confirmed no USTs are located beneath the sites. Therefore, the Project would not cause significant upset at Sites 2, 3, 4, 5, and 6 due to release from a UST.

Nearly all the nearby LUST sites have received regulatory case closure. There is one open LUST cleanup site at 1630 North Vermont, approximately 500 feet northeast of Site 5. The RWQCB approved a revised Remedial Action Plan in October 2018 to address fuel hydrocarbons in soil and groundwater at the site. Thus, the building sites would not be impacted by the LUST cleanup site.

Due to the possibility of encountering/assessing USTs, piping, dispensers, and/or any other UST system component at Site 1, the Project's impacts are considered potentially significant. However, Mitigation Measure MM-HAZ-3 is required and would reduce this potentially significant impact to a less-than-significant level.

(iv) Handling of Hazardous Materials

As previously discussed under Threshold (a), a variety of hazardous substances and wastes would be stored, used, and generated on the Project Site during construction activities. These would include fuels for machinery and vehicles, new and used motor oils, cleaning solvents, and paints, as well as storage containers and applicators containing such materials. Accidental spills, leaks, fires, explosions, or pressure releases involving hazardous materials represent a potential threat to human health and the environment if not properly stored, used, managed or treated, which could result in a significant impact.

Impacts related to handling hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school would be significant. However, Mitigation Measure MM-HAZ-2 is required and would reduce this potentially significant impact to a less-than-significant level.

[79] Site 5: Stantec, Desktop Environmental Records Review 1517 North Vermont Avenue Los Angeles, California, February 8, 2019, provided in Appendix F-3 of this Draft EIR

(b) Operation

Since Kaiser Permanente would prepare an MWMP and an HMBP prior to receiving a certificate of occupancy for each newly constructed building, any hazardous materials within the Project Site would be regulated and secured. The proposed uses and building maintenance uses could use, store, and dispose of hazardous materials, substances, and/or wastes as part of building and grounds maintenance, electrical and mechanical systems, etc. However, these hazardous materials would be used in accordance with existing regulations and in accordance with the manufacturer's requirements and would not pose hazards to visitors, patrons, and employees or to students and faculty at nearby schools. **Therefore, Project operation would not involve hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of any of the nearby schools. No mitigation measures are required.**

(2) Mitigation Measures

In order to reduce the potential for the Project to emit hazardous emissions and/or to manage the handling of hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of the nearby schools during construction, Mitigation Measures **MM-HAZ-1, MM-HAZ-2, MM-HAZ-3**, and **MM-HAZ-4** would be required. Please refer to Thresholds (a) and (b) for a description of these mitigation measures.

(3) Level of Significance after Mitigation

The Project would involve the handling hazardous or acutely hazardous materials, substances, or waste. Mitigation Measure **MM-HAZ-1** would require implementation of a PCB Waste Characterization, Segregation, Disposal, and Reuse Plan to reduce potential impacts related to PCBs. As such, impacts related to emitting hazardous emissions or within 0.25 miles of any of the nearby schools would be less than significant.

Per the recommendations included in the Additional Subsurface Assessment Report for Site 1,[80] Kaiser Permanente must provide the results of the subsurface investigation to the Los Angeles RWQCB to determine what additional actions, if any, may be required. Although Site 1 is not listed as an open regulatory case, it should be noted that Site 1 could become an open case following communication with Los Angeles RWQCB. It is anticipated that redevelopment on Site 1 would require mitigation by soil removal and/or installation of a vapor barrier/mitigation system beneath the proposed buildings. All mitigation will be required to be, and will be, completed, and any new building construction will be occupied in accordance with federal, state, and local regulations. In addition, Kaiser Permanente will be required to and will prepare an SMP for Site 1 prior to

[80] Site 1: Additional Subsurface Assessment Report 1321, 1329, 1345 North Vermont, and 1328 North New Hampshire Avenue, May 31, 2016, provided in Appendix F-1 of this Draft EIR.

excavation and redevelopment activities. The purpose of the SMP is to provide guidance to project management, site management, and field personnel on the identification and management of soil that is impacted and clean, to segregate and stockpile impacted soil, and remove and dispose of it at a disposal facility licensed to accept such soil in accordance with all applicable regulations. This SMP would include information associated with the possibility of encountering/assessment USTs, piping, dispensers, and/or any other UST system component (see Mitigation Measure **MM-HAZ-3**). In addition, Kaiser Permanente would implement Mitigation Measure **MM-HAZ-4**, which requires the incorporation of a vapor barrier into the new building plans if potential vapor encroachment conditions are indicated or suspected during construction. Incorporation of a vapor barrier would protect future occupants from impacted soils, and impacts would be less than significant.

Due to the possibility of encountering/assessing USTs, piping, dispensers, and/or any other UST system component at Site 1, Mitigation Measure **MM-HAZ-3** requires preparation of an SMP prior to excavation and redevelopment activities at Site 1. The SMP would include information associated with the possibility of encountering/ assessment USTs, piping, dispensers, and/or any other UST system component. With implementation of Mitigation Measure **MM-HAZ-3**, impacts related to USTs would be less than significant.

To reduce the potential to emit hazardous emissions or handle hazardous or acutely hazardous materials during construction activities at the Project Site, Kaiser Permanente would prepare and implement a hazardous substance management, handling, storage, disposal, and emergency response plan during all construction activities (Mitigation Measure **MM-HAZ-2**). A hazardous materials spill kit would be maintained on site for small spills that do not pose a serious risk if promptly and properly responded to. Additionally, Kaiser Permanente would monitor all contractors for compliance with applicable regulations, including regulations regarding hazardous materials and hazardous wastes, including disposal. Any hazardous materials shall be properly disposed of. All construction waste, including trash and litter, garbage, other solid waste, petroleum products, and other potentially hazardous materials, would be removed to a waste facility permitted to treat, store, or dispose of such materials (see Mitigation Measure **MM-HAZ-2**).

Therefore, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school during construction activities, with implementation of Mitigation Measures MM-HAZ-1, MM-HAZ-2, MM-HAZ-3, and MM-HAZ-4.

Threshold (d): Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment caused in whole or in part from the Project's exacerbation of existing environmental conditions?

(1) Impact Analysis

California Government Code Section Code Section 65962.5 requires various State agencies, including but not limited to the DTSC and the SWRCB, to compile lists of hazardous waste disposal facilities, unauthorized releases from USTs, contaminated drinking water wells, and solid waste facilities where there is known migration of hazardous waste, and to submit such information to the Secretary for Environmental Protection on at least an annual basis.

Site 2 is on record as containing a permitted UST. However, the lead Kaiser Permanente engineer for the Medical Center confirmed that there is no UST located beneath Site 2. Further, the LAFD information request received on January 9, 2019, noted there were no USTs on site (Appendix F-3).[81] Site 3 is not listed in database sources as containing a permitted UST, and the lead Kaiser Permanente engineer for the Medical Center confirmed that there is no UST located beneath Site 3. Further, the records review from the City of Los Angeles Department of Building and Safety noted that in over 150 building department records and permits issued between 1962 and 2016, no activities related to hazardous materials or potential environmental conditions were noted in the permit applications (Appendix F-3). [82] Site 4 is not listed in database sources as containing a permitted UST, and the lead Kaiser Permanente engineer for the Medical Center confirmed that there is no UST located beneath Site 4 (Appendix F-3).[83] The previous address of 1515 North Vermont Avenue was listed in a database source as having contained a permitted UST, with a status listed as "inactive." The lead Kaiser Permanente engineer for the Medical Center confirmed that there is no UST located beneath Site 5. Further, the records review from the City of Los Angeles Department of Building and Safety noted that in 14 building department records and permits issued between 1965 and 1996, no activities related to hazardous materials or potential environmental conditions were noted in the permit applications. The LAFD indicated on January 14, 2019, there were no records pertaining to active and hazardous materials file information, active/inactive UST files, and any records that indicate environmental concern at Site 5

81 Site 2: Stantec, Desktop Environmental Records Review 4760 Sunset Boulevard Los Angeles, California, January 31, 2019, provided in Appendix F-3 of this Draft EIR.

82 Site 3: Stantec, Desktop Environmental Records Review 1505 North Edgemont Street Los Angeles, California, February 4, 2019, provided in Appendix F-3 of this Draft EIR.

83 Site 4: Stantec, Desktop Environmental Records Review 1526 North Edgemont Street Los Angeles, California, February 8, 2019, provided in Appendix F-3 of this Draft EIR.

(Appendix F-3).[84] The property at 4950 Sunset Boulevard is listed in database sources as containing a permitted UST. However, LAFD records state that there are no USTs located beneath the property; only an aboveground diesel storage tank for the emergency generator exists. Furthermore, the lead Kaiser Permanente engineer for the Medical Center confirmed that there is no UST at Site 6 (Appendix F-3). As such, Sites 3 and 4 are not listed as containing USTs are the lead Kaiser Permanente engineer confirmed such. Although USTs are listed at Sites 2, 5, and 6 LAFD and City of Los Angeles Department of Building and Safety have no records of hazardous materials on site. Additionally, the Kaiser Permanente engineer has confirmed no USTs are located beneath the sites. Therefore, the Project would not cause significant upset at Sites 2, 3, 4, 5, and 6 due to release from a UST.

A Phase I ESA was prepared for Site 1 in March 2016 (Appendix F-1), which included a regulatory database search from EDR. Table IV.G-1 lists the facilities with the most likely potential sources of impacts to the Project Site and evaluates whether the facilities constitute a REC. According to the Phase I ESA, Site 1 was identified in the following environmental databases: CA HAZNET - Moncada's Dental Office, 1321 North Vermont Avenue (inorganic solid waste disposal); and EDR - Historical Auto Stations, formerly located at 1331 North Vermont Avenue. Although no environmental records were obtained through database research, historic use of Site 1 for automotive fueling is considered a REC. **Further investigations of Site 1 revealed construction on Site 1 could result in vapor intrusion, and thus, the implementation of Mitigation Measures MM-HAZ-3 and MM-HAZ-4 are required to reduce potentially significant impacts to a less-than-significant level.**

(2) Mitigation Measures

In order to reduce the potential for the Project to create a significant hazard to the public or the environment caused in whole or in part from the Project's exacerbation of existing environmental conditions, Mitigation Measures **MM-HAZ-3** and **MM-HAZ-4** would be required. Please refer to Threshold (b) for a description of these Mitigation Measures.

(3) Level of Significance after Mitigation

With implementation of Mitigation Measures **MM-HAZ-3** and **MM-HAZ-4**, impacts regarding the Project Site being on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 would be reduced to a less-than-significant level.

[84] Site 5: Stantec, Desktop Environmental Records Review 1517 North Vermont Avenue Los Angeles, California, February 8, 2019, provided in Appendix F-3 of this Draft EIR.

Threshold (e): Would the Project be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, and result in a safety hazard or excessive noise for people residing or working in the Project area?

As discussed in Section VI.6, Effects Not Found To Be Significant, of this Draft EIR, and in the Initial Study (Appendix A-1), the Project Site is not located within an airport land use plan, nor is it located within 2 miles of a public airport or public use airport. **Therefore, the Project would have no impact with respect to public airport safety hazards or excessive noise for people residing or working in the Project area, and no further analysis is warranted.**

Threshold (f): Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

(1) Impact Analysis

(a) Construction

According to the Safety Element of the City of Los Angeles General Plan, Sunset Boulevard, which bisects portions of the Project Site, and Vermont Avenue, which is located on the Project Site's eastern boundary, are selected disaster routes.[85] Project construction would begin in 2020 and end in approximately 2030. Therefore, the potential impacts to Sunset Boulevard and Vermont Avenue during construction of the proposed Project would occur over a 10-year period and could pose a conflict with the existing disaster route. Project construction activities could cause time travel delays and temporary roadway closures. Kaiser Permanente would prepare a CSTMP (Project Design Feature **PDF-TR-1**) and submit it to the City for review and approval. The CSTMP would formalize how construction is to be carried out and identify specific actions that are required to reduce emergency traffic access impacts on the surrounding community.

The CSTMP (Project Design Feature **PDF-TR-1**) would include measures to ensure pedestrian and bicycle safety along the affected sidewalks, bicycle facilities, and temporary walkways (e.g., use of directional signage, maintaining continuous and unobstructed pedestrian paths, and/or providing overhead covering). Additionally, coordination with the City and emergency service providers to ensure adequate access is maintained would be required.

[85] City of Los Angeles, Los Angeles General Plan Safety Element, Exhibit H, Critical Facilities and Lifeline Systems, November 1996.

Therefore, the Project's construction would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

(b) Operation

According to the Safety Element of the City of Los Angeles General Plan, Sunset Boulevard, which bisects portions of the Project Site, and Vermont Avenue, which is located on the Project Site's eastern boundary, are selected disaster routes. Operation of the proposed Project would not interfere with emergency access. Access to the Project Site would be designed in accordance with City standards and all applicable emergency access standards. Kaiser Permanente would be required to design, construct, and maintain structures, roadways, and facilities to comply with applicable local, regional, state, and/or federal requirements related to emergency access and evacuation plans. The proposed site plan, including the access driveway, would be reviewed and approved by the LAFD during plan check review.

Therefore, the Project's operations would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

(2) Mitigation Measures

Based on the analysis above, the Project's operation would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

(3) Level of Significance after Mitigation

Impacts regarding the Project's impairment or interference with an adopted emergency response plan or emergency evacuation plan were determined to be less than significant without mitigation. Therefore, no Mitigation Measures are required.

Threshold (g): Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

As discussed in Section VI.6, Effects Not Found To Be Significant, of this Draft EIR, and in the Initial Study (Appendix A-1), the Project Site is not located within a Very High Fire Hazard Severity Zone, and there are no wildlands on the Project Site. **Thus, direct and indirect impacts related to wildland fire hazards would be less than significant, and no further analysis is warranted.**

e) Cumulative Impacts

(1) Impact Analysis

As indicated in Chapter II, Environmental Setting, of this Draft EIR, there are 85 related projects in the vicinity of the Project Site. A cumulatively significant hazards impact would occur if any of related projects would contribute to the cumulatively significant release of a hazardous substance into the environment, or increase in the transport, use, or disposal of hazardous materials. As indicated in **Table II-2**, the majority of related projects proposed include apartments, retail, restaurant, hotel, condominiums, and office uses. None of the related projects' operations would require the routine transport of hazardous materials that could pose a significant threat. Construction of related projects would follow applicable federal, state, and local regulations governing the routine transport of hazardous materials. In addition, each of the related projects would require evaluation for potential threats associated with accidental releases of hazardous materials, such as LBPs, ACMs, and PCBs. Similar to the proposed Project, all of the related projects must comply with existing federal, state, and local procedures for the safe removal and remediation of any hazardous substances. The Project would not, therefore, result in a cumulatively significant impact related to the release of hazardous materials or exposure to a health hazard in excess of regulatory standards, or hazardous emissions within 0.25 miles of an existing or proposed school.

According to the Safety Element of the City of Los Angeles General Plan, Sunset Boulevard, which bisects portions of the Project Site, and Vermont Avenue, which is located on the Project Site's eastern boundary, are selected disaster routes. Although some related projects may have the potential to result in physical modifications to nearby streets designated as disaster routes, both Project construction and operation would not require or result in any modifications to roadways. In addition, the Project would not impede the implementation of an emergency response plan with the implementation of the CSTMP and Project Design Feature **PDF-TR-1**.

Therefore, the Project's contribution to impacts on hazards and hazardous materials would not be cumulatively considerable, and cumulative impacts would be less than significant.

(2) Mitigation Measures

Cumulative impacts related to hazards and hazardous materials would be less than significant. No additional mitigation measures to address cumulative impacts are required.

(3) Level of Significance after Mitigation

With regard to cumulative hazards and hazardous materials, each related project would be required to comply with applicable regulatory requirements. In addition, as part of the environmental review processes for the related projects, it is expected that Mitigation Measures would be established as necessary to address potential site-specific impacts. Therefore, Project impacts would not be cumulatively considerable, and cumulative impacts are considered less than significant.